

Field Sampling Plan for the Accelerated Retrieval Project I

Beth A. McIlwain

May 2006

**Idaho
Cleanup
Project**

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**Idaho Cleanup Project
Idaho Falls, Idaho 83415**

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ABSTRACT

The purpose of the Accelerated Retrieval Project I is to demonstrate a simplified retrieval system for removal of transuranic waste at the Subsurface Disposal Area. This field sampling plan describes how and where samples will be collected during waste retrieval operations to support determination of the (1) transuranic activity and physical description of the materials, which would have otherwise not been retrieved, that affect visual criteria for future decisions; (2) presence of radiological OU 7-13/14 contaminants of concern in material which would have otherwise not been retrieved, (3) concentration of volatile organic compounds and radiological contaminants of concern in the underburden; and (4) whether the excavated waste zone material should be regulated under the Toxic Substances Control Act. The plan also describes how samples will be collected of roaster-oxide waste to support disposition of roaster-oxide waste to Idaho National Laboratory Comprehensive Environmental Response, Compensation, and Liability Act Disposal Facility or other facility.

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ACRONYMS

ARP I	Accelerated Retrieval Project I
CCP	Central Characterization Project
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
COC	contaminant of concern
DOE	U.S. Department of Energy
DPS	drum packaging station
DQO	data quality objective
EDF	engineering design file
EPA	U.S. Environmental Protection Agency
FGE	fissile gram equivalent
FSP	field sampling plan
ICDF	INL CERCLA Disposal Facility
ID	identification
INL	Idaho National Laboratory
MCP	management control procedure
NTCRA	non-time-critical removal action
NTW	nontargeted waste
OU	operable unit
PPE	personal protective equipment
QAPjP	quality assurance project plan
QC	quality control
PCB	polychlorinated biphenyl
RCRA	Resource Conservation and Recovery Act
RE	Retrieval Enclosure
RFP	Rocky Flats Plant

RI/FS	remedial investigation and feasibility study
ROD	record of decision
RWMC	Radioactive Waste Management Complex
SAP	sampling and analysis plan
SDA	Subsurface Disposal Area
TCLP	toxicity characteristic leaching procedure
TRU	transuranic
TSCA	Toxic Substances Control Act
TW	targeted waste
UTS	Universal Treatment Standard
VOC	volatile organic compound
WGS	Waste Generator Services
WIPP	Waste Isolation Pilot Plant
WZM	waste zone material

Field Sampling Plan for the Accelerated Retrieval Project I

1. INTRODUCTION AND SITE BACKGROUND

The U.S. Department of Energy (DOE) Idaho Operations Office, with agreement from the U.S. Environmental Protection Agency (EPA) and Idaho Department of Environmental Quality (DOE-ID 2004a), has selected a designated portion of Pit 4 for implementation of a non-time-critical removal action (NTCRA) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 USC § 9601 et seq., 1980) at the Idaho National Laboratory (INL) Site. The project is referred to as the Accelerated Retrieval Project I (ARP I).

The DOE has determined that the removal action shall, to the extent practicable, contribute to the efficient performance of any anticipated long-term remedial action. Specifically, the proposed removal action, in addition to addressing a material portion of the hazardous substances in the Subsurface Disposal Area (SDA) at the INL Site, will provide characterization, and technical and cost information from full-scale waste retrieval activities that will support the remedial investigation and feasibility study (RI/FS) for Operable Unit (OU) 7-13/14. The removal action also will establish process details for certification and transfer of formerly buried transuranic (TRU) waste to the Waste Isolation Pilot Plant (WIPP) in New Mexico.

1.1 Objectives of the Sampling

This field sampling plan (FSP) describes the collection and analysis of samples needed to:

- Determine the TRU activity and capture a physical description of sampled materials which would have otherwise not been retrieved that affect visual criteria for future decisions
- Determine the acceptability of roaster-oxide waste for disposition at INL CERCLA Disposal Facility (ICDF) or other facility
- Determine the concentration of radiological OU 7-13/14 contaminants of concern (COCs) at selected locations in sampled materials which would have otherwise not been retrieved
- Determine the concentration of volatile organic compounds (VOCs) and radiological OU 7-13/14 COCs in the underburden
- Determine whether the excavated waste zone material (WZM) should be regulated under the Toxic Substances Control Act (TSCA) (15 USC § 2601 et seq., 1976).

The project facilities and processes are being designed to safely conduct a targeted retrieval of the following Rocky Flats Plant (RFP) waste streams: Series 741 and 743 sludge, graphite, filters, and roaster-oxide waste. The process comprises waste retrieval in a Retrieval Enclosure (RE), transfer of waste into containers at clean drum-packaging stations, assay of the waste containers after release from the RE, and interim storage in a storage enclosure located within the SDA or alternatively in WMF-628.

1.2 Scope of the Sampling Plan

The work described in this FSP will be used to:

- Verify and improve the visual segregation method for targeting certain RFP TRU waste forms
- Evaluate the presence of radiological OU 7-13/14 COCs in material that stays in the pit
- Confirm the absence of radiological COCs in the underburden
- Determine the concentration of VOCs in the underburden
- Determine the appropriate TSCA classification of the excavated waste
- Characterize roaster-oxide waste for future disposition.

Together, this FSP and the *Quality Assurance Project Plan for Waste Area Groups 1, 2, 3, 4, 5, 6, 7, 10, and Deactivation, Decontamination, and Decommissioning* (DOE-ID 2004b) are considered the sampling and analysis plan for the project. These plans do not address WIPP-related activities. This FSP has been prepared in accordance with the Idaho Cleanup Project management control procedure, “Environmental Sampling Activities at the INEEL” (ICP-MCP-9439) and describes the field activities that are part of the investigation. The *Quality Assurance Project Plan* (QAPjP) (DOE-ID 2004b) describes the processes and programs that ensure the generated data will be suitable for the intended use.

1.3 Site Background

The INL Site is a DOE facility, located 52 km (32 mi) west of Idaho Falls, Idaho, that occupies 2,305 km² (890 mi²) of the northeastern portion of the Eastern Snake River Plain. The Radioactive Waste Management Complex (RWMC) is located in the southwestern portion of INL Site, as shown in Figure 1. The SDA is a 39-hectare (97-acre) area located within the RWMC. The SDA consists of 20 pits, 58 trenches, 21 soil vault rows, Pad A, and the Acid Pit where waste disposal activities occurred. Pit 4 is located in about the center of the SDA. The described area for retrieval is located in the eastern half of Pit 4.

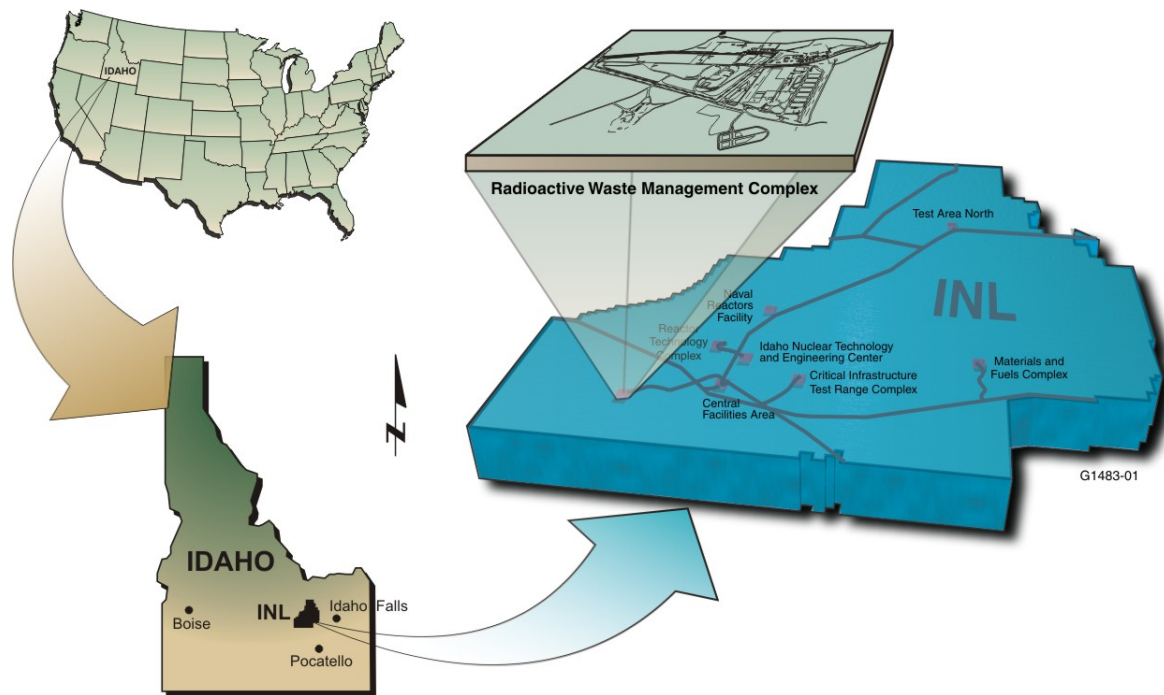


Figure 1. Map showing the location of the Radioactive Waste Management Complex at the Idaho National Laboratory Site.

The selection of the described retrieval area within Pit 4 (see Figure 2) for the ARP I was based on an evaluation of shipping and burial records of containerized radioactive materials and sludge from RFP and radioactive waste generated at INL. From these records, several 1/2-acre areas within the SDA that contain relatively large amounts of TRU or other contaminated waste were targeted.

The objective of the NTCRA is to perform a targeted retrieval of certain RFP waste streams that contain significant concentrations of the COCs identified in the OU 7-13/14 risk assessment (Holdren et al. 2002). To achieve this objective, the NTCRA will focus on visual identification and removal of the following RFP waste streams: Series 741 and 743 sludge, graphite, filters, and roaster-oxide waste. Overall remediation of WAG 7 is being evaluated through a CERCLA RI/FS under OU 7-13/14. Ultimately, the RI/FS will lead to risk-management decisions and selection of a final comprehensive remedial approach through development of a CERCLA record of decision (ROD) and follow-on remedial design and activities.

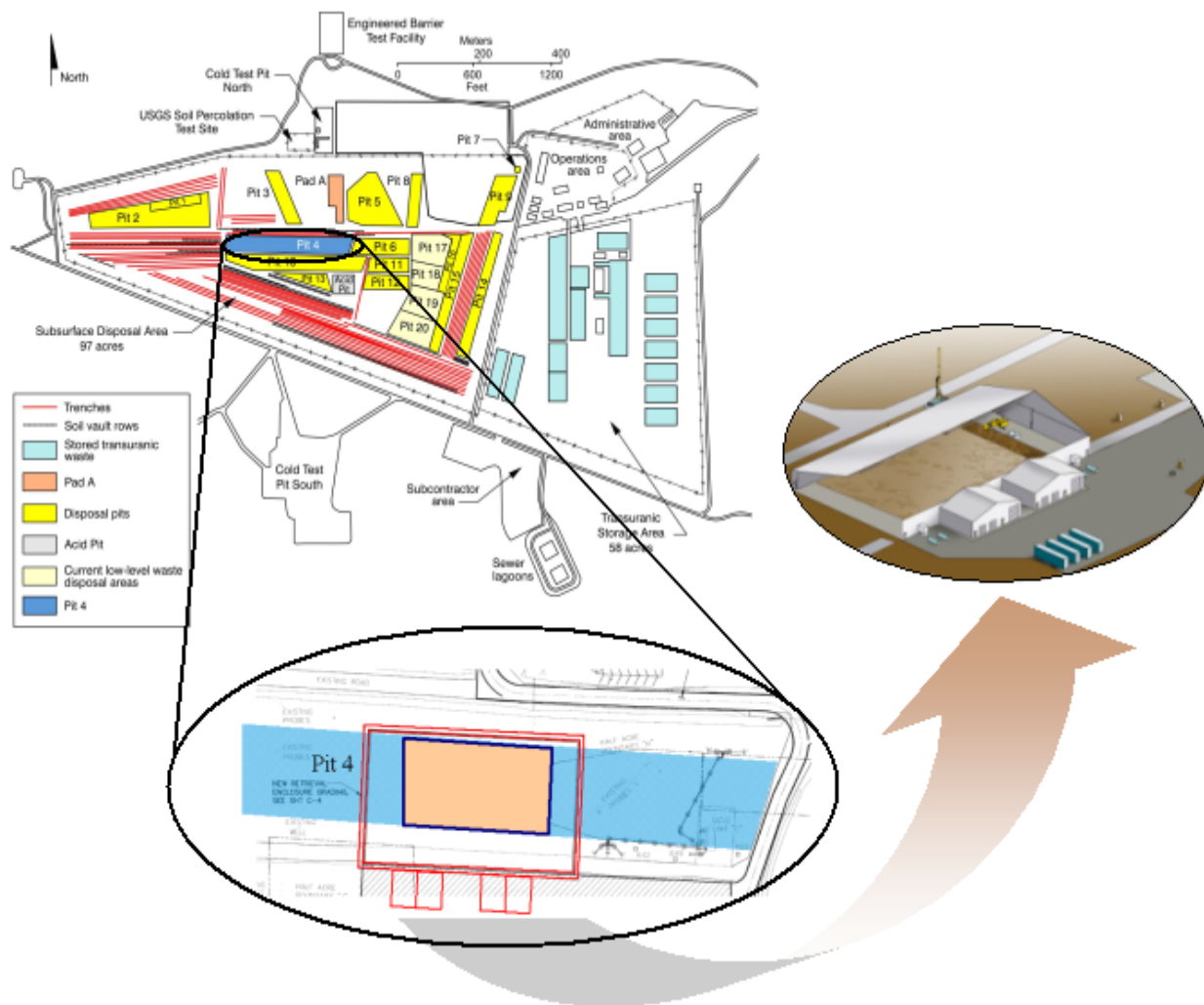


Figure 2. Map of the Subsurface Disposal Area showing location of the described area within Pit 4.

1.3.1 Background of Pit 4 within the Subsurface Disposal Area

Pit 4 was open to receive waste from January 1963 through September 1967. Based on the disposal practices at the time, containerized waste, primarily from RFP in Colorado, was initially stacked in the pit. This practice was later changed, and containers were dumped into the pits rather than stacked to reduce labor costs and personnel exposures. Based on retrieval information resulting from initial retrieval activities, a portion of the waste in the west end of the original retrieval area is stacked. Inventory information indicates that the waste in the remainder of the pit was dumped rather than stacked. Additional waste from INL waste generators and some waste from off-Site generators also were disposed of in the pit.

The disposal process in the 1960s involved excavating an area in the SDA, with tractor-drawn scrapers, to the outcroppings of the underlying basalt. This was followed by backfilling and leveling of the newly constructed pit floor with a layer of native soil, approximately 0.6 m (2 ft) thick, on which the waste would be placed. Waste was contained in drums; cardboard, wood, and metal boxes; and other containers. After waste was emplaced, pits were backfilled and initially covered with about 1 m (3 ft) of soil, commonly referred to as overburden soil. The estimated overburden thickness in Pit 4 ranges from

1.2 to 2.1 m (4 to 7 ft). The additional soil thickness resulted from maintenance activities that added soil cover to the SDA in the 1970s and 1980s (Holdren et al. 2002; EG&G 1985). After approximately 40 years of burial, the original disposal containers, including the carbon steel drums, were expected to be significantly degraded similar to the drums removed in early 2004 as part of the Glovebox Excavator Method Project activities. However, initial retrieval experience has shown that the drums in the designated retrieval area are in significantly better condition than those retrieved from Pit 9 in 2004. Many drums are relatively intact, especially those associated with the stacked waste.

The pits were excavated to various sizes. Pit 4, shown on Figure 2, is located in the approximate center of the SDA and shares a common eastern boundary with Pit 6. Pit 4 has a surface area of 9,948.2 m² (107,082 ft²). The total volume of Pit 4 is estimated at 45,307 m³ (1,600,000 ft³) (Holdren et al. 2002). The original retrieval area of focus comprised approximately 31% of the overall area of Pit 4 with approximate dimensions of 38.4 × 74.4 m (126 × 244 ft). As discussed in Section 1, the designated portion of Pit 4 was selected because it contains high concentrations of TRU waste and also contains significant volumes of other targeted waste (TW) forms, including VOCs and uranium. The approximate 1/2-acre size was selected based on the existing distribution of waste in the pit and other engineering factors (e.g., economies of scale associated with retrieval).

1.3.2 Estimated Waste Inventory in the Designated Retrieval Area of Pit 4

The OU 7-13/14 program has developed extensive information defining the waste inventories disposed of in the pits, trenches, and soil vault rows in the SDA. Disposal records and corresponding trailer load list information from RFP are the ultimate source for the available information for the disposal locations and waste type designations. The OU 7-13/14 programs have developed a number of databases and supporting geographical information system applications to document waste inventory type, quantity, and location information. Based on this information, an engineering design file (EDF) has been developed: EDF-4478, "Waste Inventory of Area G in Pit 4 for the Accelerated Retrieval Project within the Radioactive Waste Management Complex." This EDF summarizes the information on the volumes and types of waste buried in the designated portion of Pit 4. Table 1 provides a summary of information contained in the EDF.

The RFP waste forms contain various radiological and nonradiological contaminants. The material shipped to Pit 4 from RFP included plutonium and uranium isotopes. Plutonium isotopes included Pu-238, Pu-239, Pu-240, Pu-241, and Pu-242. Uranium isotopes (i.e., U-234, U-235, U-236, and U-238) were shipped to the RWMC in the form of depleted uranium oxides. Also included in the waste shipments were Am-241 and trace quantities of Np-237. The isotopes Am-241 and Np-237 are daughter products resulting from the radioactive decay of Pu-241. In addition to the Am-241 produced by the decay of the Pu-241, Am-241 removed from plutonium during processing at RFP also was disposed of in Pit 4. This extra Am-241 is a significant contributor to the total radioactivity located in Pit 4. A number of radionuclides (e.g., Co-60, Cs-137, Sr-90, Y-90, and Ba-137), primarily from INL waste generators, are also expected to be encountered in the ARP I area. The non-RFP waste streams include radioactively contaminated sewage sludge and a number of combustible and noncombustible debris waste forms.

Both organic and inorganic chemicals are known to be in Pit 4. The primary organic chemicals known to be in Pit 4 include carbon tetrachloride, trichloroethene, 1,1,1-trichloroethane, tetrachloroethene, lubricating oils, Freon-113, alcohols, organic acids, and Versenes (ethylenediaminetetraacetic acid). Examples of inorganic chemicals known to be in the waste include hydrated iron, zirconium, beryllium, lead, sodium nitrate, potassium nitrate, cadmium, dichromates, potassium phosphate, potassium sulfate, silver, asbestos, and calcium silicate. Table 1 describes and summarizes the major waste streams located in the designated retrieval area from RFP. As the table

shows, the major waste streams consist of containerized (e.g., boxes and drums) sludge, combustible and noncombustible debris, graphite materials, and discarded filter media.

Table 1. Rocky Flats Plant waste content in the 1/2-acre designated retrieval area of Pit 4 within the Subsurface Disposal Area.

Waste Stream	Summary Characteristics	Packaging	Estimated Container Number
Series 741 first-stage sludge	Salt precipitate containing plutonium and americium oxides, depleted uranium, metal oxides, and organic constituents.	18.1 to 22.7 kg (40 to 50 lb) of Portland cement added to top and bottom of drum to absorb any free liquids. Two plastic bags.	886 drums
Series 742 second-stage sludge	Salt precipitate containing plutonium and americium oxides, metal oxides, and organic constituents.	18.1 to 22.7 kg (40 to 50 lb) of Portland cement added in layers to absorb any free liquids. Two plastic bags.	770 drums
Series 743 sludge organic setups	Organic liquid waste solidified using calcium silicate (pastelike or greaselike).	113.6 L (30 gal) of organic waste mixed with 45.4 kg (100 lb) calcium silicate. Small quantities (4.5 to 9.1 kg [10 to 20 lb]) of Oil-Dri added to top and bottom, if necessary. Two plastic bags.	634 drums
Series 744 sludge special setups	Complexing chemicals (liquids) including Versenes, organic acids, and alcohols solidified with cement.	86.2 kg (190 lb) of Portland cement and 22.7 kg (50 lb) of magnesia cement in drum followed by the addition of 99.9 L (26.4 gal) of liquid waste. Additional cement top and bottom. Two plastic bags.	81 drums
Combustible, noncombustible, and mixed debris	Solid radioactively contaminated combustible debris items such as paper, rags, cardboard, and wood. Noncombustible debris varies widely including pipe, empty drums, glass, and sand. Some waste is contaminated with beryllium metal.	Varies by process line generating the waste. Waste may have been wrapped in plastic or placed directly into the waste container.	5,024 drums, boxes, and dumpster loads
Roaster-oxide waste	Incinerated depleted uranium. Primary chemical form is uranium oxide with some metal possible.	Packaged in metal drums with inner plastic bag packaging.	109 drums
Graphite	Graphite mold pieces after excess plutonium removal. Molds are broken into large pieces before packaging. Graphite fines (e.g., scarfings) packaged in small bottles.	Drums lined with polyethylene bags and, most likely, a cardboard liner. Bottles of graphite fines were individually wrapped in plastic bags.	490 drums
Filters	Discarded high-efficiency particulate air filters.	Packaged in cardboard cartons and boxes depending on the timeframe of disposal.	681 boxes and cartons

Waste management activities will be based on information from the various inventory documents identified in the preceding paragraphs and the acceptable knowledge documentation prepared to support the NTCRA (Abbott et al. 2004). In addition, analytical data collected during project activities will be used to determine appropriate management of primary waste streams.

Buried waste in Pit 4 contains TRU and low-level waste. The transuranic radionuclides in Pit 4 are believed to be primarily contained in the drummed sludge and other RFP waste (e.g., graphite). Waste definitions are provided below for purposes of clarification:

- **Transuranic radionuclides**—radionuclides with an atomic number greater than 92 (DOE Order 435.1).
- **Transuranic waste**—without regard to source or form, waste that is contaminated with alpha-emitting transuranic radionuclides (atomic number greater than 92) with half-lives greater than 20 years and concentrations greater than 100 nCi/g at the time of assay. The primary radionuclides associated with SDA RFP TRU waste are Pu-238, Pu-239, Pu-240, Pu-242, and Am-241.
- **Low-level waste**—waste that is not high-level radioactive waste, spent nuclear fuel, TRU waste, by-product material (as defined in Section 11e[2] of “Atomic Energy Act of 1954” [42 USC § 2011-2259, 1954]), or naturally occurring radioactive material (DOE Order 435.1).

1.4 Report Organization

Section 2 presents the sampling objectives and data quality objectives (DQOs). Section 3 describes the sample locations and frequency. Section 4 provides information about sample designation and associated requirements. Section 5 contains a description of sampling equipment and procedures. Section 6 describes sample handling and analysis, including sample labeling and custody requirements. Section 7 discusses management of waste generated from the sampling activities, and Section 8 contains the cited references.

2. SAMPLING AND DATA QUALITY OBJECTIVES

The DQOs to support project objectives are described in *Data Quality Objectives for the Accelerated Retrieval Project for a Described Area within Pit 4* (McIlwain 2004).

Data quality objectives are qualitative and quantitative statements derived from the first six steps of the EPA DQO process that:

- Clarify the study objective
- Define the most appropriate type of data to collect to meet project needs
- Determine the most appropriate conditions from which to collect the data
- Specify tolerable limits on decision errors that will be used as a basis for establishing the quantity and quality of data needed for decision-making.

The DQOs are discussed in context of the DQO process as defined by EPA guidance in EPA QA/G-4, “Guidance for the Data Quality Objectives Process” (EPA 1994). This process was developed by EPA to ensure the type, quantity, and quality of data used in decision-making is appropriate for the intended application.

The project-controlled sampling activities described herein are only a portion of the overall DQOs required for the project. The primary objective of this FSP is to collect samples to:

- Ensure safe and compliant storage of drums
- Measure the activity of nontargeted waste (NTW) that would remain in the pit
- Evaluate presence of certain OU 7-13/14 radiological COCs in NTW at selected locations
- Confirm the absence of certain OU 7-13/14 radiological COCs in the underburden
- Determine the concentration of VOCs in the underburden
- Determine the appropriate TSCA classification of the excavated waste
- Characterize roaster-oxide materials to meet ICDF and other off-site waste acceptance criteria (WAC).

The DQOs for the objectives pertinent to this FSP are presented in Table 2. Sampling to determine the appropriate Toxic Substances Control Act (TSCA) (15 USC § 2601 et seq., 1976) classification of the excavated waste will be covered under the WIPP/Resource Conservation and Recovery Act (RCRA) (42 USC § 6901 et seq.) sampling plan.

2.1 Quality Assurance Objectives for Measurement

The quality assurance objectives for measurement will meet or surpass the minimum requirements for data quality indicators established in the QAPjP (DOE-ID 2004b). The QAPjP provides minimum requirements for the following measurement quality indicators: precision, accuracy, representativeness, completeness, and comparability. Precision, accuracy, and completeness will be calculated in accordance with the QAPjP.

2.1.1 Precision

Precision is a measure of the reproducibility of measurements under a given set of conditions. In the field, precision is affected by sample collection procedures and the unknown and potentially extreme heterogeneity of the buried waste. Overall precision is estimated by the variability (i.e., standard deviation) across all regular samples within a population. This value can then be used to calculate the upper confidence bounds of the applicable mean concentrations.

Overall precision (i.e., field and laboratory) evaluations can be supported by collecting duplicate samples. Laboratory precision will be based on the use of laboratory-generated duplicate samples or matrix spike and matrix spike duplicate samples. Evaluation of laboratory precision will be performed during the process of method data validation. No field duplicates will be collected for the NTW and roaster-oxide sampling. The NTW sample data statistics will provide a picture of the variability of the material activity remaining in the pit. The roaster-oxide sample data statistics will provide a picture of the variability of the waste retrieved. No field duplicates will be collected for the OU 7-13/14 NTW sampling.

2.1.2 Accuracy

Accuracy is a measure of bias in a measurement system. Bias is the systematic or persistent distortion of a measurement process that causes errors in one direction. Laboratory accuracy is demonstrated using laboratory control samples, blind quality control (QC) samples, and matrix spikes. Evaluation of laboratory accuracy will be performed during the method data validation process. Sample preservation and handling, field contamination, and the sample size and matrix affect overall accuracy. The representativeness of the sample (discussed below) is also a factor in the overall accuracy of the result.

2.1.3 Representativeness

Representativeness is a qualitative parameter that expresses the degree to which the sampling and analysis data accurately and precisely represent a characteristic of a population, the parameter variations at a sampling point, or an environmental condition. In addition, representativeness addresses the proper design of the sampling program. Confirming that random sampling was performed and a sufficient number of samples are collected to meet the required confidence level will satisfy the representativeness criterion for material that would have otherwise not been retrieved (not targeted). The Agencies agreed to measure the activity remaining in the pit using the following parameters to estimate the mean: 90% confidence level, 0.2 relative error, and a 1.0 coefficient of variation. The OU 7-13/14 project determined that six samples from the first 1/4 acre and six samples from the second 1/4 acre would be sufficient to evaluate the presence of radiological COCs in material that would have otherwise not been retrieved (not targeted). During an Agency meeting held on July 19, 2004, it was agreed that 5–6 underburden samples would be sufficient to determine the presence of VOCs and confirm the absence of OU 7-13/14 radiological COCs in the underburden. The roaster-oxide waste will be characterized by estimating the mean concentration of contaminants using the following parameters: 80% confidence level, 0.2 relative error, and a 0.5 coefficient of variation. Random samples will be collected from a population of roaster-oxide waste. The waste population to be sampled is a subset of the roaster-oxide waste population retrieved during operations. It is assumed that the overall populations are not different.

Table 2. Data quality objectives for sampling conducted under this field sampling plan.

Objective	Data Use	Measurement	Sampling Method	Analytical Method	Analytical Level	Required Detection Level	Comments and Rationale
Ensure safe and compliant storage of retrieved waste	1. Collect sufficient information to support safe and compliant storage per approved waste acceptance criteria for ARP I stored waste and future disposition	1. Compatibility of hazardous materials	1. NA	1. Acceptable Knowledge	Definitive, screening, health physics survey	1. NA	1. Acceptable knowledge is the inventory basis and documented evaluation of compatibility of a binary combination of chemicals
		2. Volume in new package	2. Visual at closure of container	2. Visual		2. Nearest 1/8 drum	
		3. Pu-239 FGE	3. Fissile material monitoring	3. Fissile material monitor		3. Monitor capability	
		4. Weight of container		4. Weigh drum		specification is for minimum detectable activity of 1 g Pu-239 FGE (using a 5-minute count time)	
		5. Radiological dose rate requirements for container disposal	4. NA	5. Radiological survey			
		6. Hazardous waste determination	5. 100% container radiological survey	6. HWD will be made based on available process waste stream information			3. If drum assay results are >200 FGE, then special storage conditions are required
		7. PCBs	6. NA	7. SW-846 Method 8082		4. NA	
			7. Location-based random sampling		5. Based on disposal facility requirements	5. Based on disposal facility requirements	7. Thirty samples will be taken in the first 1/4 acre (i.e., Phase 1) to make the TSCA determination for drums that originate from that 1/4 acre. A separate, identical determination for the second 1/4 acre will also be made (i.e., Phase 2).
					6. NA	6. NA	Sampling to determine the appropriate TSCA classification of the excavated waste is covered under the WIPP/RCRA sampling plan (see footnote a of main body).
					7. Per procedure	7. Per procedure	

Table 2. (continued).

Objective	Data Use	Measurement	Sampling Method	Analytical Method	Analytical Level	Required Detection Level	Comments and Rationale
Characterize retrieved roaster-oxide material for disposition	Provide data on excavated roaster-oxide material to meet ICDF or other off-Site facility WAC.	<ol style="list-style-type: none"> 1. UTS metals 2. PCBs 3. VOCs 4. Semivolatile organic compounds 5. Paint Filter Liquids Test 6. Extractable Cyanide, Total and Amenable to Chlorination 6.7. Radionuclide activity 7.8. Radiological dose rate requirements for container disposal 	<ol style="list-style-type: none"> 1-65. Random drum sampling of a drum population 76. 100% drum assay 87. 100% container radiological survey 	<ol style="list-style-type: none"> 1. SW-846 Method 6010B/ 7000A 2. SW-846 Method 8082 3. SW-846 Method 8260B 4. SW-846 Method 8270C 5. SW-846 Method 9095B 6. SW-846 Method 9014 or 9213 67. Nondestructive assay 78. Radiological survey 	<ol style="list-style-type: none"> Definitive, health physics survey 	<ol style="list-style-type: none"> 1-65. Per procedure 67. Based on ICDF or other receiving facility requirements 78. Based on ICDF or other receiving facility requirements 	<ol style="list-style-type: none"> 5. Paint Filter Liquids Test is required to support disposition at Envirocare as appropriate. 67. Waste must be <10 nCi/g TRU for acceptance at ICDF.
Provide data on material that stays in the pit (sampled materials that would have otherwise not been retrieved)	Verify efficiency of visual criteria for future decisions	<ol style="list-style-type: none"> 1. Visual description 2. a. Transuranic activity (i.e., Ci) b. Pu-239 equivalent activity (i.e., PE-Ci) c. Pu-239 FGE d. Uranium isotopic masses (U-233, U-234, and U-238) e. Plutonium isotopic masses (Pu-238, Pu-239, Pu-240, and Pu-242) f. Am-241 mass g. Total fissile mass (U-233, U-235, and Pu-239) h. Nonfissile beta-gamma emitting radionuclides (Sr-90 and Cs-137) 	<ol style="list-style-type: none"> 1. Visual assay will provide TRU characterization 2. 100% drum assay 	<ol style="list-style-type: none"> 1. a. Detailed description of material b. Photograph of material 2. Nondestructive assay 	<ol style="list-style-type: none"> Definitive, screening 	<ol style="list-style-type: none"> 1. NA 2. Per WIPP approved procedure (as achievable with current technology). 	<ol style="list-style-type: none"> TRU determination is made of the drum contents by Central Characterization Project

Table 2. (continued).

Objective	Data Use	Measurement	Sampling Method	Analytical Method	Analytical Level	Required Detection Level	Comments and Rationale
Provide data not provided by assay on material that stays in the pit	Evaluate the presence of radiological OU 7-13/14 COCs	<ol style="list-style-type: none"> 1. Technetium-99 2. Iodine-129 3. Carbon-14 4. Chlorine-36 5. Plutonium isotopes (Pu-238 and Pu-239/240) 6. Neptunium-237 7. Uranium isotopes (U-233/234, U-235/236, U-238) 	Approach involves collection of sample material from the NTW collected at designated locations	<ol style="list-style-type: none"> 1. Liquid scintillation or equivalent counting method 2. Low energy photon spectrometry or equivalent counting method 3. Liquid scintillation or equivalent counting method 4. Liquid scintillation or equivalent counting method 	Definitive	<ol style="list-style-type: none"> 1. 1 pCi/g in accordance with QAPjP^a 2. 1 pCi/g in accordance with QAPjP^a 3. 3 pCi/g in accordance with QAPjP^a 4. 10 pCi/g 5-7. 0.05 pCi/g in accordance with QAPjP^a 	
Provide characterization data for VOCs and radiological OU 7-13/14 COCs in the underburden	Characterize underburden soil to evaluate release of VOCs and radiological OU 7-13/14 COCs	<ol style="list-style-type: none"> 1. Technetium-99 2. Iodine-129 3. Carbon-14 4. Chlorine-36 5. Plutonium isotopes (Pu-239 and Pu-239/240) 6. Neptunium-237 7. Uranium isotopes (U-233/234, U-235/236, U-238) 8. VOCs 	Approach involves collection of core samples by using the excavator. Underburden cores will be collected by inserting a sampling tube to collect core. To prevent the core from falling apart in the core barrel, a compressible plug will be placed in the core barrel before sampling. The plug will fit tight enough so that it does not move freely but can be readily displaced as the core moves up into the core barrel.	<ol style="list-style-type: none"> 1. Liquid scintillation or equivalent counting method 2. Low energy photon spectrometry or equivalent counting method 3. Liquid scintillation or equivalent counting method 4. Liquid scintillation or equivalent counting method 5-7. Alpha spectroscopy 	Definitive	<ol style="list-style-type: none"> 1. 1 pCi/g in accordance with QAPjP^a 2. 1 pCi/g in accordance with QAPjP^a 3. 3 pCi/g in accordance with QAPjP^a 4. 10 pCi/g 5-7. 0.05 pCi/g in accordance with QAPjP^a 8. Per procedure 	Based on project objectives, underburden is not excavated but is exposed to allow sampling for VOCs and radionuclide COCs
<p>a. DOE-ID (2004b)</p> <p>ARP I = Accelerated Retrieval Project I</p> <p>COC = contaminant of concern</p> <p>FGI = fissile gram equivalent</p>							
			<p>OU = operable unit</p> <p>QAPjP = quality assurance project plan</p> <p>PCB = polychlorinated biphenyl</p> <p>TCLP = toxicity characteristic leaching procedure</p>				
			<p>TSCA = Toxic Substances Control Act</p> <p>UTS = Universal Treatment Standard</p> <p>VOC = volatile organic compound</p> <p>WIPP = Waste Isolation Pilot Plant</p>				

2.1.4 Detection Limits

Detection limits are specified for analysis of PCBs in WZM samples, constituents in OU 7-13/14 NTW samples, constituents in the roaster-oxide waste and constituents in underburden soil samples in the QAPjP. The detection requirements for the TRU assay of NTW are as specified, or defined, by the Central Characterization Project (CCP).

2.1.5 Completeness

Completeness is a measure of the quantity of usable data collected during an investigation. The QAPjP requires that an overall completeness goal of 90% be achieved for noncritical samples. If critical parameters or samples are identified, a 100% completeness goal is specified. Critical data points are those sample locations or parameters for which valid data must be obtained for the sampling event to be considered complete. The samples collected under this FSP will be considered noncritical with a completeness goal of 90%.

2.1.6 Comparability

Comparability is a qualitative characteristic that refers to the confidence with which one data set can be compared to another. The analytical procedures used for characterization are standard and will be comparable to those procedures historically followed by other programs.

2.2 Data Validation

Method data validation is the process whereby analytical data are reviewed against set criteria to ensure the results conform to the requirements of the analytical method and any other specified requirements.

All laboratory-generated analytical data for NTW, WZM, roaster-oxide, and underburden samples will be reviewed for analytical method compliance and technical merit.

3. SAMPLE LOCATION AND FREQUENCY

Project sampling activities will focus on sample collection during waste retrieval as discussed in the following subsections.

3.1 Overview of Waste Excavation Process

To provide protection from the weather and control the spread of contamination, a Retrieval Enclosure (RE) with airlocks (see Figure 3) will cover the retrieval area during all retrieval operations.

The RE is a temporary, relocatable structure that will house excavation, packaging, sampling, package decontamination, and personnel and equipment ingress and egress activities. Two attached structures house airlock operations, including waste examination and packaging. Operators in personal protective equipment (PPE) will operate a Gradall XL-5200 excavator to retrieve material from a described area within Pit 4 (see Figure 2) into waste containers. The waste zone is expected to be approximately 3.4 to – 4.6 m (10–15 ft) deep and the walls will be sloped to maintain an angle of repose as needed to support safe operations. The excavator will retrieve waste zone material for subsequent processing. Segregation of waste as TW and NTW may be done by trained operations personnel employing visual and other methods (e.g., field screening). Nontargeted waste (e.g., debris and soil) will remain within the excavation area. Once segregated, TW will be repackaged into suitable containers (e.g., drums or boxes).

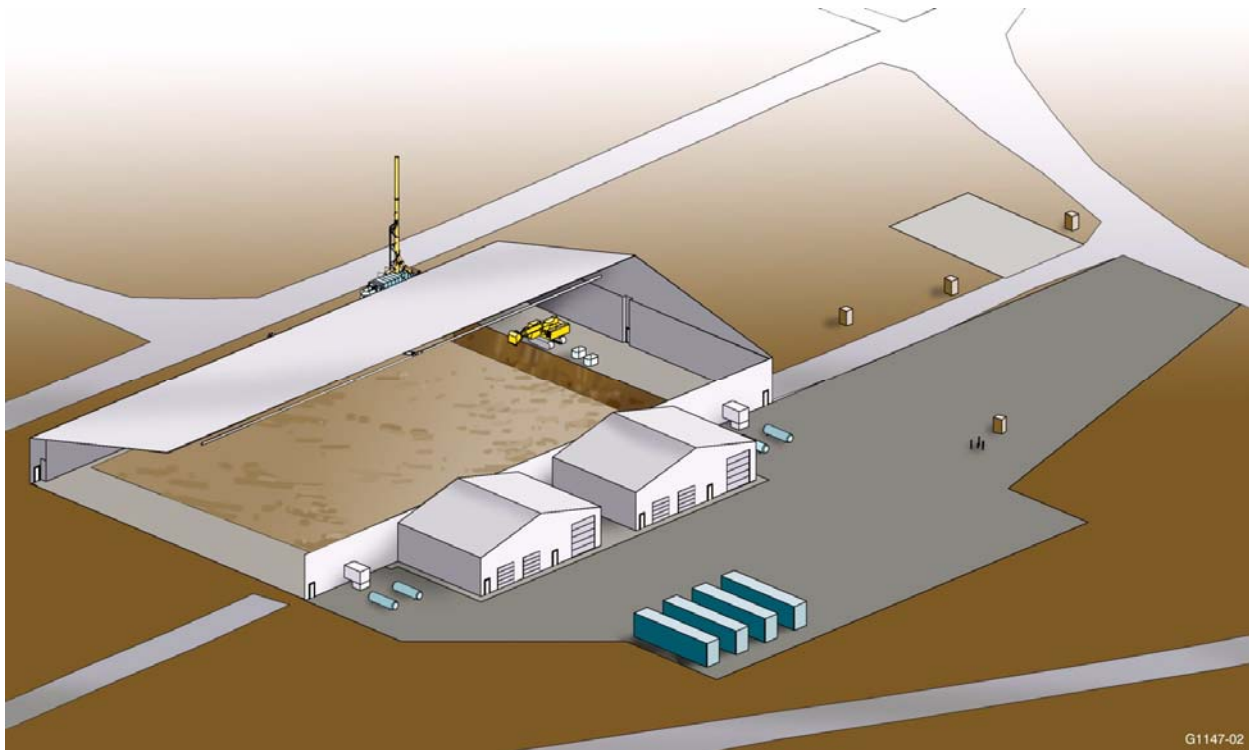


Figure 3. The Retrieval Enclosure will cover the retrieval area during operations.

The project plans a staged excavation campaign. The staged operation will segment the excavation site into an initial trench digging campaign and a moving trench campaign. The initial trench excavates and relocates approximately one-eighth of the total pit volume and is required to open a region within the pit for the second moving trench operation. The initial trench campaign stages NTW within the retrieval enclosure and removes TW from the pit. The moving trench campaign will transfer the NTW from the

initial trench campaign into the pit, remove TW from the pit, and relocate NTW from the east face of the trench to the west face.

3.2 Sampling Location and Frequency

This section details the location and frequency of samples collected during ARP I.

Initially, the defined waste zone area within Pit 4 to be retrieved consisted of an area of about 0.50 acres. Subsequently, the area contractually identified for accelerated retrieval was reduced to only a portion (approximately half) of this 0.50-acre area. The specific, reduced area identified for retrieval within the initial 0.50-acre waste zone area is shown in Figure 4.

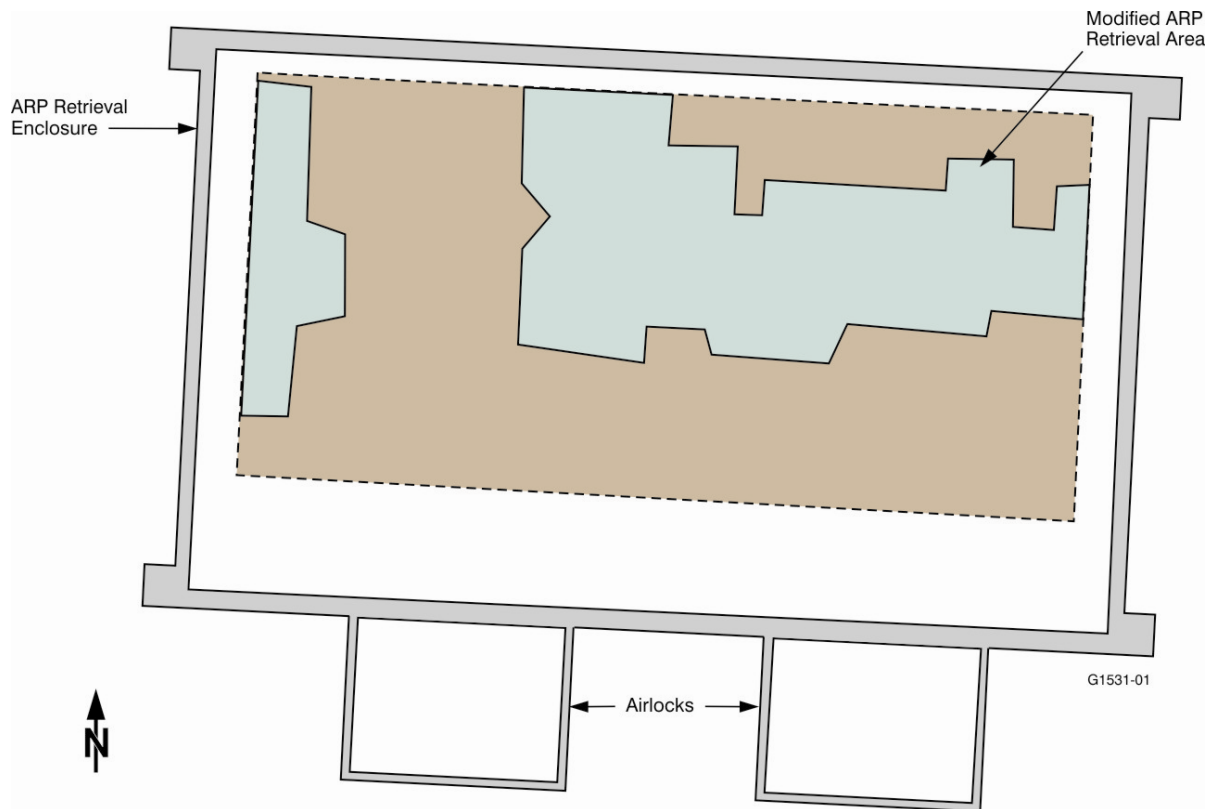


Figure 4. Illustration of the revised retrieval area.

As described in the following sections, random selection of sample locations was determined based on retrieval of the entire 0.50-acre waste zone area. Implementation of the reduced retrieval area would require that samples will only be collected from those random locations from the initial selection that fall within the revised waste zone retrieval area. Implementation of retrieval for the entire 0.50-acre area would allow collection of all originally planned samples. The specific sample numbers and sample locations (corresponding to the bolded sample numbers and sampling coordinates identified in Tables 3 through 11) falling within the revised retrieval area that either already have been or will be collected for sampling and analysis are as follows:

- Nontargeted waste random sample locations (30 locations within revised area): A1-T, A6-B, A8-B, F2-M, F4-T, F5-B, F6-T, G3-T, G4-B, G5-M, H2-M, H2-B, H3-T, H4-B, I3-M, I4-M, I5-B, J2-T, J5-T, L2-B, L4-M, LB-M, M4-M, M5-B, N3-T, N3-M, N3-B, N5-T, P2-M, P4-B.
- Nontargeted waste sample locations for OU 7-13/14 (6 locations within revised area): F4-T, F5-B, F6-T, J5-T, M5-B, N5-T.

- Underburden random sample locations (3 locations within revised area): G-4, K-4, O-5.
- Waste zone materials first 1/4-acre (i.e., Phase 1) random sample numbers for collection (15 locations within the revised area): 1, 2, 3, 4, 5, 6, 12, 13, 14, 17, 19, 21, 22, 25 and 28.
- Waste zone materials second 1/4-acre (i.e., Phase 2) random sample numbers for collection (12 locations within the revised area): 32, 33, 34, 42, 43, 44, 45, 51, 52, 53, 55 and 56.

With the exception of the reduction in size of the retrieval area and the associated impact on the samples to collect, the initial sample selection methodology remains unchanged and is presented in its entirety in this section.

3.2.1 Sampling Nontargeted Waste

The sampling approach will be to collect 68 random samples of NTW material that would have otherwise not been retrieved. The random samples will be collected from the angle of repose following the return of NTW from the east face of the pit to the west face. A specially colored sampling tray liner will be used to indicate that the material is designated for sampling. The excavator operator will radio the grid and depth to the person responsible for data collection at the drum packaging station (DPS).



The west and north walls of the RE are marked in approximately 4.6-m (15-ft) grid increments to subdivide the retrieval area. The grid markings on the west wall number 1 through 9 and the wall markings for the north wall are A through R. The shift manager will identify to the excavator operator the locations in the pit designated for NTW sample collection. The location will be specified using the grid markings on the north and west end walls of the RE and an associated depth. Sample depths will be specified based on dividing the waste zone into thirds (i.e., top [approximately 0–1.2 m {0–4 ft}], middle [approximately 1.2–2.5 m {4–8 ft}], and bottom [approximately 2.5–3.7+ {8–12+ ft}]). The excavator operator, therefore, will have a 4.6×4.6 -m (15×15 -ft) by approximately 1.2-m (4-ft) volume that is designated for sample collection (see Figure 5). To the extent practicable, the sample will be collected from the center of the designated sample location. Adjustments may be necessary because of physical limitations caused by the angle of repose. The timing of sample collection at a designated location is dependent on the penetration of the NTW angle of repose (i.e., slope on the west side of the open trench) into the applicable grid location. In other words, the sample can only be collected after there is NTW (on the west side of the trench) present in the designated sample location. The operations shift manager is responsible for monitoring the progress of NTW return activities and identifying the optimum timing for NTW sample collection.


To arrive at the required 68 samples, the area available to sample NTW was defined, and eligible grid locations were identified.

Grids Q and R (all depths) on the east side of the retrieval area were excluded because of the location of the emptied trench at the completion of excavation operations. Also at completion, NTW in Grid P will be present but is expected to only lie on the angle of repose. This condition is based on the estimated dimension of the west-east opening at the top of the trench (approximately 13.7 m [45 ft]). The real opening, however, may be larger or smaller depending on the actual depth of the waste zone. Additionally, eligible grid locations along the south side of the pit (Grid 9) were limited to the “top” depth location because only 6 linear ft (approximate) of the 38.4-m (126-ft) west dimension of the retrieval area falls within this grid. Therefore, only the top depth location would be available for collecting NTW samples.

A total of 400 eligible grid locations were identified. A random number generator was then used to pick the 68 sample locations from the 400 eligible locations.

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R
1	T A1-T										K1-T	L1-T	M1-B	N1-T				
	M																	
	B																	
2	T	B2-T						H2-M		J2-T						P2-M		
	M	B2-M				F2-M		H2-B				L2-B						
	B							H3-T						N3-T				
3	T			D3-T					I3-M					N3-M				
	M		C3-M											N3-B				
	B																	
4	T	B4-T	C4-T			F4-T			I4-M			L4-M	M4-M					
	M			D4-B				H4-B								P4-B		
	B																	
5	T									J5-T				N5-T				
	M			D5-B		F5-B			I5-B				M5-B					
	B					F6-T												
6	T													N6-M	O6-T			
	M	B6-M										L6-M						
	B															P6-B		
7	T	B7-T	C7-T							J7-M		L7-M			O7-M			
	M		C7-M					H7-M										
	B			D7-B														
8	T	B8-T	C8-T								K8-T	L8-T	M7-B					
	M													N8-M				
	B	B8-B	C8-B							J8-B		L8-B		N8-B				
9	T																	
	M																	
	B																	

 Nontargeted waste material available for sampling is limited due to the angle of repose.
 No nontargeted waste material available for sampling.

 Location designated for Agency sampling of nontargeted waste material (chosen randomly). T= Top third, M= Middle third, B= Bottom third.
 Example: Grid D7 from Bottom (approx. 10' depth).

 Location designated for Agency underburden sampling.

 Location designated for Agency sampling of nontargeted waste material (chosen randomly) where a sample will be collected from the retrieved nontargeted waste to evaluate the presence of radiological constituents.

Figure 5. Nontargeted waste sample locations.

The grid markings from the north and west walls of the RE combined with the depth (top, middle, or bottom third) define the random location for each sample. The 68 random locations of the NTW samples are given in Table 3.

Table 3. Nontargeted waste sample locations.

Random Sample Number	North Wall Grid	West Wall Grid	Depth (location in angle of repose)
1	A	1	Top
2	A	6	Bottom
3	A	8	Bottom
4	B	2	Top
5	B	2	Middle
6	B	3	Middle
7	B	4	Middle
8	B	6	Middle
9	B	7	Top
10	B	8	Top
11	B	8	Bottom
12	C	3	Middle
13	C	4	Top
14	C	7	Top
15	C	7	Middle
16	C	8	Top
17	C	8	Bottom
18	D	3	Top
19	D	4	Bottom
20	D	5	Bottom
21	D	7	Bottom
22	E	2	Middle
23	E	6	Bottom
24	F	2	Middle
25	F	4	Top
26	F	5	Bottom
27	F	6	Top
28	G	3	Top
29	G	4	Bottom
30	G	5	Middle
31	H	2	Middle
32	H	2	Bottom
33	H	3	Top

Table 3. (continued).

Random Sample Number	North Wall Grid	West Wall Grid	Depth (location in angle of repose)
34	H	4	Bottom
35	H	7	Middle
36	I	3	Middle
37	I	4	Middle
38	I	5	Bottom
39	J	2	Top
40	J	5	Top
41	J	7	Middle
42	J	8	Bottom
43	K	1	Top
44	K	8	Top
45	L	1	Top
46	L	2	Bottom
47	L	4	Middle
48	L	6	Middle
49	L	7	Middle
50	L	8	Top
51	L	8	Bottom
52	M	1	Bottom
53	M	4	Middle
54	M	5	Bottom
55	M	7	Bottom
56	N	1	Top
57	N	3	Top
58	N	3	Middle
59	N	3	Bottom
60	N	5	Top
61	N	6	Middle
62	N	8	Middle
63	N	8	Bottom
64	O	6	Top
65	O	7	Middle
66	P	2	Middle
67	P	4	Bottom
68	P	6	Bottom

Twelve of the randomly selected NTW sampling locations have been chosen by OU 7-13/14 for sampling of the NTW tray in the DPS. The NTW random sample locations were chosen based on proximity to the locations designated for underburden sample collection. The NTW is collected from the return side of the pit, and what was near to an underburden sample location would have moved to the west as the excavation progressed. The NTW random sample numbers and locations of the NTW samples selected by OU 7-13/14 are given in Table 4.

Table 4. Nontargeted waste sample locations for OU 7-13/14 sample collection.

Random Sample Number	North Wall Grid	West Wall Grid	Depth (location in angle of repose)
13	C	4	Top
14	C	7	Top
22	E	2	Middle
25	F	4	Top
26	F	5	Bottom
27	F	6	Top
39	J	2	Top
40	J	5	Top
54	M	5	Bottom
55	M	7	Bottom
60	N	5	Top
61	N	6	Middle

3.2.2 Sampling Underburden Soil

Swaths of underburden will be exposed during excavation. The excavator operator will perform random collection of six underburden samples.

The exposed area that would be available to sample underburden was defined using the excavation area dimensions and the angle of repose in the pit. This eliminated the outside border of the pit defined by the RE wall markings number 1 and 8/9 and the letters A and R. The area of available underburden that would be exposed during the retrieval was divided into 96 approximately 4.6-m (15-ft) square grids and six locations were selected using a random number generator. The random locations for underburden sample collection are given in Table 5. The random grid numbers are presented in ascending order rather than the order in which they were generated.

Table 5. Underburden sample locations.

Underburden Sample Number	Wall Marking Coordinates
1	D - 6
2	G - 4
3	K - 2
4	K - 4
5	N - 7
6	O - 5

The core retrieval design allows for core recoveries by inserting a sample tube as far as possible with the excavator arm into the underburden or until refusal, whichever occurs first. The approximate boom angle will be used to calculate the depth of sample collection. If the excavator is not able to collect a core from the middle of the identified grid, core collection may be attempted at a different location within the identified grid.

It should be noted that the soil column collected in the sample tube may be compacted as part of the sampling process. Consequently, insertion of the sample tube may result in a sample core length less than the insertion depth. This is an acceptable result. Extracted cores will be capped, sealed, and labeled to indicate orientation such that:

- **Top**—Indicates side of core originating near the surface of exposed underburden
- **Bottom**—Indicates portion of core originating near the contact with refusal or the end of the core interval.

Following transfer to the analytical laboratory, the core will be photographed, the length of the soil column in the core will be measured, and the core will be subsampled. When the core liner is advanced into the underburden to collect the sample, some of the contaminated material may be smeared along the inside of the sample liner as well. Therefore, a thin layer of sediment should be removed from the core liner to avoid the possibility of cross-contamination. Approximately 1/2 in. at each end of the core will be trimmed to avoid possible cross-contamination.

If less than 1 ft of soil is collected, the laboratory will collect subsamples from the bottom-most portion of the core.

If a 1-ft core sample is collected, the laboratory will collect subsamples from the midpoint of the top half and bottom-most portion of the bottom half of the core to support identification of concentration gradients as a function of depth. Approximately 1/2 in. of the lower core will be discarded or excluded from sampling to mitigate any cross-contamination during core handling in the RE.

3.2.3 Waste Zone Materials Sampling

Thirty samples will be taken in the first 1/4 acre (i.e., Phase 1) to make the TSCA determination for drums that originate from that 1/4 acre. A separate, identical determination for the second 1/4 acre will also be made (i.e., Phase 2). The waste zone in the described area is approximately 0.2 ha (1/2 acre) by 3.7 m (12 ft) deep. It is expected that the waste zone will not be homogeneous, but rather heterogeneous. The sampling approach considers this by addressing both spatial and temporal variability of the waste and is consistent with EPA SW-846, Chapter 9, “Sampling Plan.”

Temporal variability is inherently addressed because the waste will be considered as a process batch with the results applying to that batch. Spatial variability is addressed by using a constrained randomization scheme that forces an appropriate estimate of the variability across the waste zone. By stratifying the waste into three 1.2-m (4-ft) thick layers, vertical heterogeneity is included in the variability estimate. Constrained randomization means that an equal number of samples are taken randomly from each 1.2-m (4-ft) layer so that bias due to unequal sample sizes per layer is avoided. This is consistent with stratified random sampling discussed in SW-846, Chapter 9. Randomness of sampling at each layer also serves to protect against any type of horizontal bias, such as might occur with systematic or haphazard sampling at each layer.

Random sampling is accomplished by partitioning the defined area within each retrieval phase into 192 cubical volumes and randomly selecting volumes for sampling. This equates to three layers,

approximately 1.2 m (4 ft) thick, with each layer containing 64 cubical volumes in each defined area. Thirty of the 192 cubical volumes in each defined area will be randomly selected with the constraint that each layer contains 10 randomly selected cubical volumes. The random selection for each layer is accomplished by listing the 64 cubical volumes in the first two columns of an Excel spreadsheet by a grid-numbering scheme. The third column contains random numbers using the rand() function. Then the three columns are sorted based on the column of random numbers. The first 10 rows in the sorted column of grid numbers then become the randomly selected cubical volumes for that layer. This is repeated for each layer.

The material to be sampled is the homogeneous solids and soil and gravel from the defined areas of Pit 4. Material will be retrieved from roughly the cubical volume and sampled at the packaging station. If a selected sample location turns out to be all debris, the preselected coordinates cannot be used for sampling, and a replacement location is necessary. The replacement strategy entails sampling the first acceptable waste form that is identified in the direction that excavation is proceeding. The replacement sample and associated x, y, z coordinates that are excavated will be documented.

Identification of the sampling locations begins at the northwest corner of the retrieval area at an elevation of 1,528 m (5,014 ft); RWMC Site-specific horizontal datum coordinates are documented in Drawing 628247 (official use only). The excavation slope was assumed to be approximately a 45-degree angle. During recent preretrieval activities, waste was encountered at an elevation of 1,527 m (5,011 ft). Given this, the waste zone will begin at 1,527-m (5,011-ft) elevation. Therefore, the area to be included in the random sampling begins 1 m (3 ft) east and 1 m (3 ft) south of the Northing and Easting location identified in the northwest corner of Drawing 628247 (official use only). Figures 6–11 present the randomly selected cubical volumes for each of the three layers in Phase 1, respectively. Each layer is smaller than the previous layer due to the assumed approximately 45-degree angle of repose. Tables 6–11 present the horizontal center of the randomly selected cubical volumes for each layer of Phase 1, respectively. The samples should be taken at the horizontal center of the cubical volume plus or minus 1 m (3 ft). Each layer is approximately 1.2 m (4 ft) thick, and the sample should be collected at the vertical center of the cubical volume plus or minus 0.6 m (2 ft). This would be at elevations 1,527, 1,526, and 1,524 m (5,009, 5,005, and 5,001 ft). If waste is encountered above the anticipated 1,527-m (5,011-ft) elevation; samples should still be collected at the defined elevations.

The above process to locate and collect WZM samples is already in place for the Pit 4 WIPP/Resource Conservation and Recovery Act (RCRA) (42 USC § 6901 et seq.) sampling campaign (CCP 2005). Each WZM sample for PCB analysis should be collected from the same tray and quadrant as the WIPP/RCRA sample, but after the WIPP/RCRA sample has been removed.

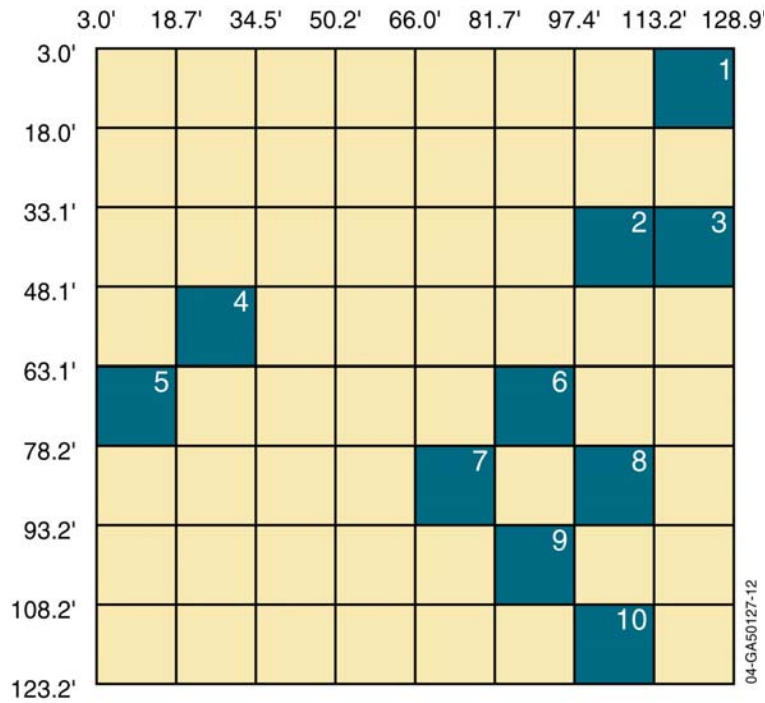


Figure 6. Random selection of cubical volumes for Phase 1, Layer 1 (0–4 ft) of the waste zone.

Table 6. Phase 1, Layer 1 grid center-points.

Random Sample	Feet in x-direction from Northwest Coordinate of Retrieval Area	Feet in y-direction from Northwest Coordinate of Retrieval Area
1	121.1	-10.5
2	105.3	-40.6
3	121.1	-40.6
4	26.6	-55.7
5	10.9	-70.7
6	89.6	-70.7
7	73.9	-85.7
8	105.3	-85.7
9	89.6	-100.7
10	105.3	-115.7

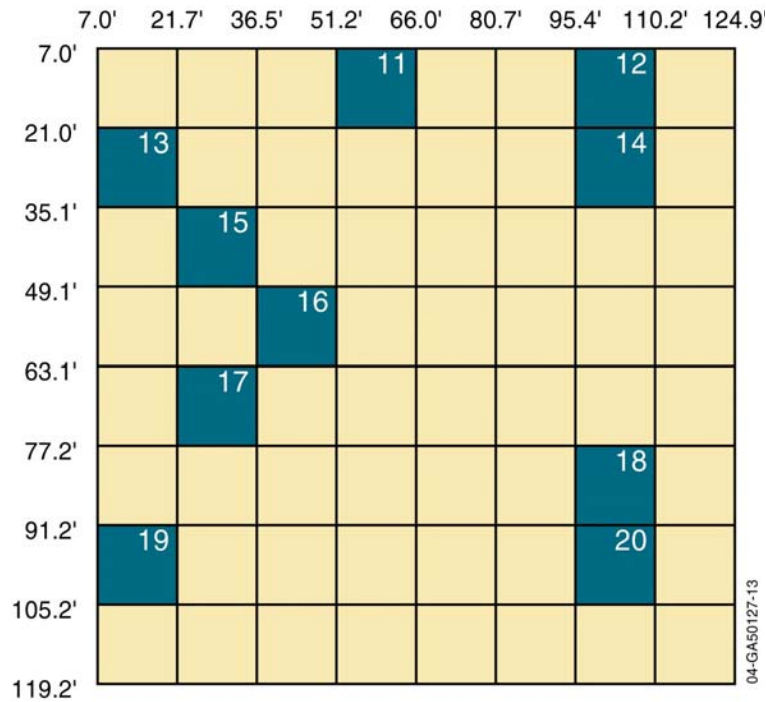


Figure 7. Random selection of cubical volumes for Phase 1, Layer 2 (4–8 ft) of the waste zone.

Table 7. Phase 1, Layer 2 grid center-points.

Random Sample	Feet in x-direction from Northwest Coordinate of Retrieval Area	Feet in y-direction from Northwest Coordinate of Retrieval Area
11	58.6	-14.0
12	102.8	-14.0
13	14.4	-28.1
14	102.8	-28.1
15	29.1	-42.1
16	43.9	-56.1
17	29.1	-70.2
18	102.8	-84.2
19	14.4	-98.2
20	102.8	-98.2

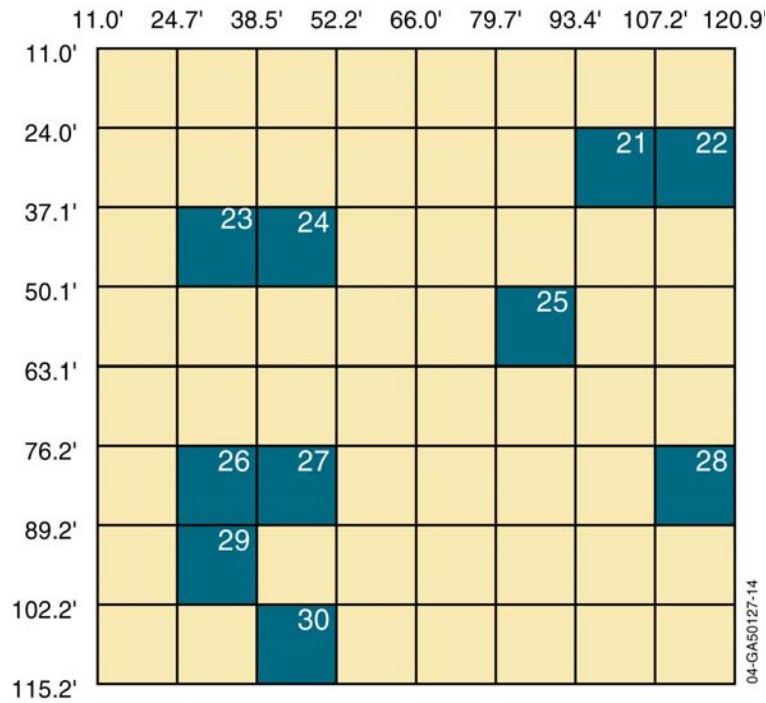


Figure 8. Random selection of cubical volumes for Phase 1, Layer 3 (8–12+ ft) of the waste zone.

Table 8. Phase 1, Layer 3 grid center-points.

Random Sample	Feet in x-direction from Northwest Coordinate of Retrieval Area	Feet in y-direction from Northwest Coordinate of Retrieval Area
21	100.3	-30.6
22	114.1	-30.6
23	31.6	-43.6
24	45.4	-43.6
25	86.6	-56.6
26	31.6	-82.7
27	45.4	-82.7
28	114.1	-82.7
29	31.6	-95.7
30	45.4	-108.7

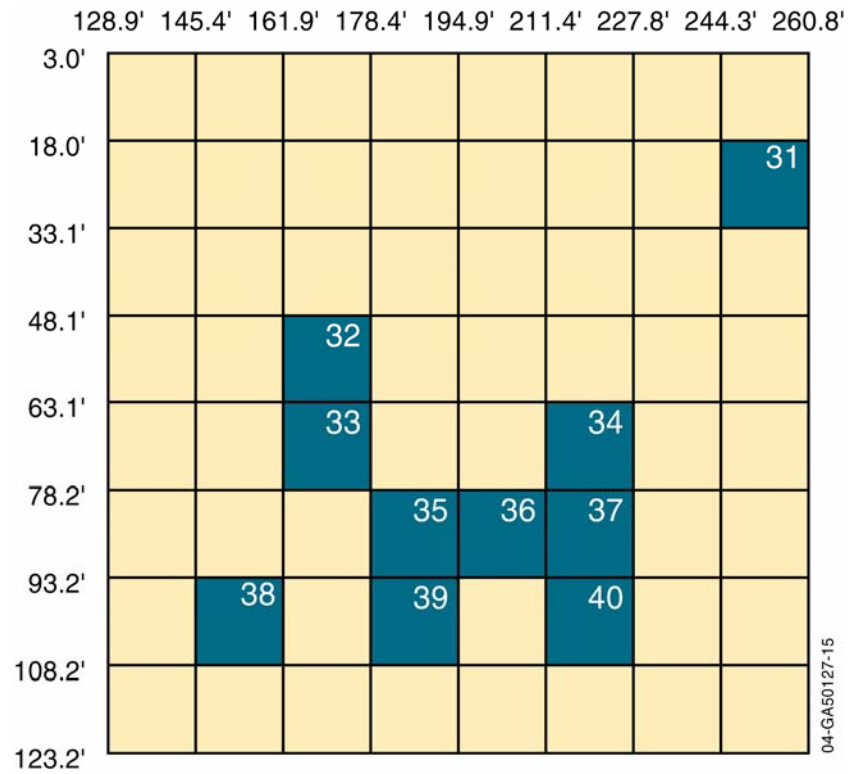


Figure 9. Random selection of cubical volumes for Phase 2, Layer 1 (0–4 ft) of the waste zone.

Table 9. Phase 2, Layer 1 grid center-points.

Random Sample	Feet in x-direction from Northwest Coordinate of Retrieval Area	Feet in y-direction from Northwest Coordinate of Retrieval Area
31	252.6	-25.6
32	170.2	-55.6
33	170.2	-70.7
34	219.6	-70.7
35	186.7	-85.7
36	203.2	-85.7
37	219.6	-85.7
38	153.7	-100.7
39	186.7	-100.7
40	219.6	-100.7

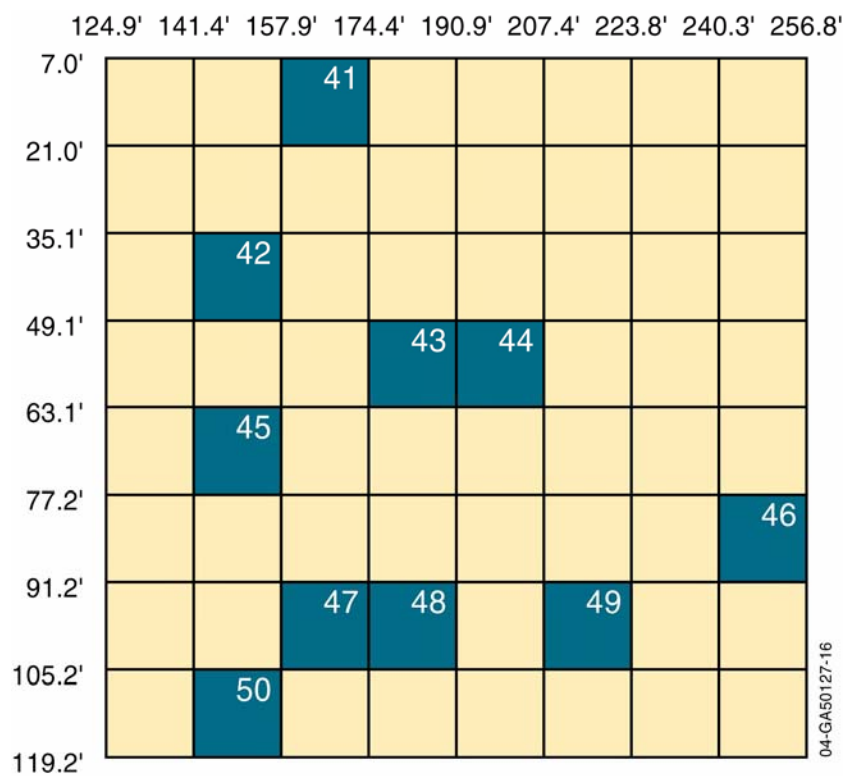


Figure 10. Random selection of cubical volumes for Phase 2, Layer 2 (4–8 ft) of the waste zone.

Table 10. Phase 2, Layer 2 grid center-points.

Random Sample	Feet in x-direction from Northwest Coordinate of Retrieval Area	Feet in y-direction from Northwest Coordinate of Retrieval Area
41	166.2	-14.0
42	149.7	-42.1
43	182.7	-56.1
44	199.2	-56.1
45	149.7	-70.2
46	248.6	-84.2
47	166.2	-98.2
48	182.7	-98.2
49	215.6	-98.2
50	149.7	-112.2

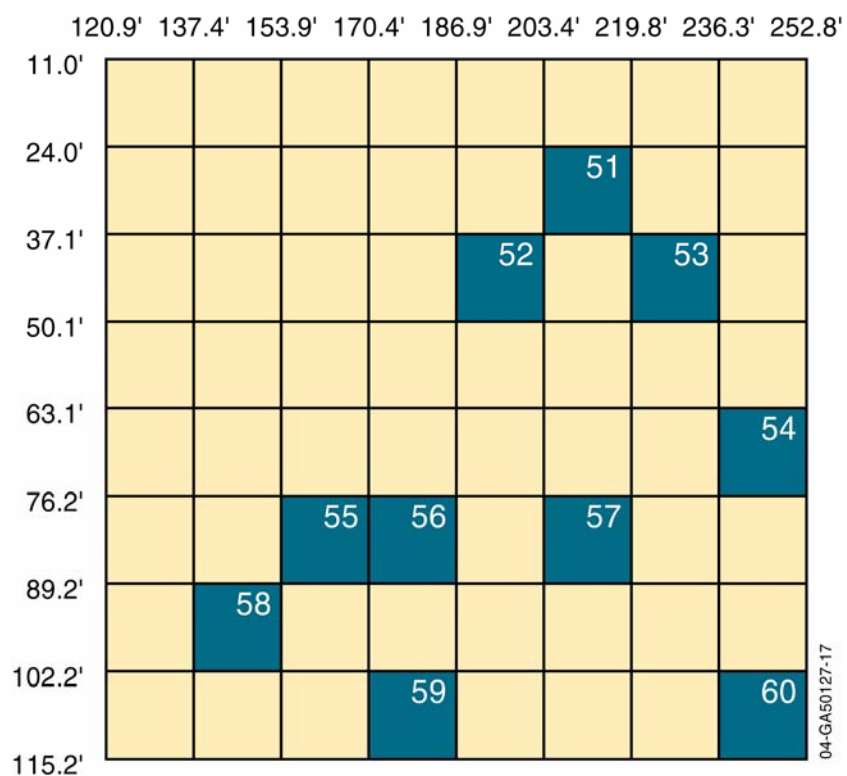


Figure 11. Random selection of cubical volumes for Phase 2, Layer 3 (8–12+ ft) of the waste zone.

Table 11. Phase 2, Layer 3 grid center-points.

Random Sample	Feet in x-direction from Northwest Coordinate of Retrieval Area	Feet in y-direction from Northwest Coordinate of Retrieval Area
51	211.6	-30.6
52	195.2	-43.6
53	228.1	-43.6
54	244.6	-69.7
55	162.2	-82.7
56	178.7	-82.7
57	211.6	-82.7
58	145.7	-95.7
59	178.7	-108.7
60	244.6	-108.7

3.2.4 Roaster-Oxide Sampling

Roaster-oxide sampling is planned to be performed as a prepackaging process. The sampling population will be a 30-drum lot of roaster-oxide waste. The drums collected will be assigned a number between 1 and 30 based on the order of being processed through the DPS. Ten drums will be randomly selected for sampling from the 30-drum population using a random number generator. If sampling is performed before accumulation of the 30-drum lot, a record will be maintained that tracks the lot and allows for additional sampling campaigns of that same 30-drum lot. If operational constraints require any or all of the sampling to be performed in a postpackage manner, this minor modification will be noted in the appropriate logsheet and will not require revision of this plan.

3.2.5 Waste Management and Operations Support Sampling

During the process of excavation, sample collection may be needed for the waste management activities or operations support. Sampling will be performed if the waste can safely be managed by retrieval operations using the personnel, facilities, and equipment readily available onsite.

4. SAMPLE DESIGNATION

4.1 Sample Identification Code

A systematic 10-character sample identification (ID) code will be used to uniquely identify samples. Uniqueness is required for maintaining consistency and preventing the same ID code from being assigned to more than one sample.

A sampling and analysis plan (SAP) table and database will be used to record all pertinent information associated with each sample ID code. Issuance and control of sample IDs will be coordinated with the Integrated Environmental Data Management System technical leader of Sample and Analysis Management.

The NTW sample drum identifications and detailed description of the waste will be recorded on a sample data form. The SAP table discussed in this section applies only to the planned underburden samples.

4.2 Sampling and Analysis Plan Table and Database

4.2.1 General

A SAP table format was developed to simplify the presentation of the sampling scheme for project personnel. The following subsections describe the information recorded in the SAP table and database presented in Appendix A.

4.2.2 Sample Description Fields

The sample description fields contain information about individual sample characteristics.

4.2.2.1 Sampling Activity. The sampling activity field contains the first six characters of the assigned sample number. The sample number in its entirety will be used to link information from other sources (e.g., field data and analytical data) to the information in the SAP table for data reporting, sample tracking, and completeness reporting. The analytical laboratory will also use the sample number to track and report analytical results.

4.2.2.2 Sample Type. Data in the sample type field will be selected from the following:

REG = Regular sample

QC = Quality control sample.

4.2.2.3 Sample Matrix. Data in the sample matrix field will be selected from the following:

SOIL = Underburden soil

WASTE = Waste zone material.

4.2.2.4 Collection Type. Data in the collection type field will be selected from the following:

GRAB = Grab

RANDM = Random

DUP = Duplicate.

4.2.2.5 Planned Date. This date is related to the planned sample collection start date.

4.2.3 Sample Location Fields

This group of fields pinpoints the location for the sample in three-dimensional space, starting with the general area, narrowing the focus to a grid location geographically, and then specifying the depth in the depth field when applicable.

4.2.3.1 Area. This field identifies the general sample-collection area (e.g., RWMC – PIT4).

4.2.3.2 Location. This field may contain geographical coordinates, building numbers, or other location identifying details. Data in this field will normally be subordinated to the area field. The location of the underburden sample collected will be recorded using the x, y, z coordinates. The z-coordinate will be collected using the depth monitor within the excavator cab.

4.2.3.3 Type of Location. This field supplies descriptive information concerning the sample location.

4.2.3.4 Depth. The depth of a sample location is the distance in feet from the surface level or a range in feet from the surface. Depth field will be represented as TBD (to be determined) and will be captured during sample retrieval (measured using the depth monitor within the excavator cab). The depth monitor on the excavator corresponds to the depth below the surface of excavation on which the excavator is riding. The depth monitor indicates the depth below the tracks and since the excavator will be sitting on 0.3 to 0.6 m (1 to 2 ft) of potentially contaminated soil, the depth monitor will indicate the depth into the waste plus the thickness of potentially contaminated soil. The excavator boom will give the approximate angle that can be used to calculate the depth of underburden core sample collection.

4.2.4 Analysis Types

4.2.4.1 AT1 through AT20. These fields contain analysis code designations. Specific descriptions for these analysis codes are provided at the bottom of the SAP table.

5. SAMPLING EQUIPMENT AND PROCEDURES

This section describes the sampling procedures and equipment the project will use to collect project samples. The following sections include guidance on sample collection. A specially colored tray liner will be used for all sample collection activities. Daily work orders will identify the sampling to be performed. The orders and communication with the operators at the DPS will be used to identify whether the cart is designated for NTW or WZM sampling.

5.1 Quality Assurance and Quality Control Samples

The NTW sample drums collected during excavation will be assayed using the CCP TRU assay system.

The Sample and Analysis Management will issue a task order scope of work for established laboratories to analyze roaster-oxide and underburden soil samples described by this plan, and data from the analyses will be considered definitive. All internal laboratory QA/QC procedures will be followed in accordance with the appropriate laboratory statements of work prepared for this project. Table 1-5 of the QAPjP describes generally recommended field quality assurance sampling, including the items described in the following subsections.

5.1.1 Duplicates

For this sampling project, no duplicate NTW and underburden samples will be collected. Sampling of NTW is being performed to collect data on the average activity present, and the standard deviation of the mean from drum assay data will indicate field variability. Sampling of roaster-oxide waste is being performed to collect data on the average concentration of hazardous constituents, and the standard deviation of the mean from the analysis data will indicate variability. OU 7-13/14 NTW sampling and underburden sample collection is meant to provide information on OU 7-13/14 radiological COCs. Measurement of the field precision is not an objective.

Duplicate WZM and roaster-oxide samples will be collected at the frequency prescribed in the QAPjP. Table 1-5 of the QAPjP recommends collecting the duplicate samples at a frequency of 5%. This collection frequency is represented in the SAP tables contained in Appendix A. Duplicates will be collected in the same manner as the regular sample with which they are being collected.

5.1.2 Field Blanks

The QAPjP recommends collection of field blanks for OU 7-13/14 NTW samples or subsurface soils collected for radionuclide analyses. Field blanks will not be collected as part of this investigation because it will be physically impractical or impossible for operations personnel to pour analyte-free water into a sample container at the sample collection site inside the RE. Measures will be taken to mitigate cross-contamination of recovered soil cores with contamination expected in the RE and areas where cores may be handled. Subsampling of cores will take place in a clean environment. The upper and lower portion of the cores (approx. 1/2 in.) will be discarded from analysis. Sampling equipment used during sample collection (e.g., scoops and spoons) are single-use items.

The QAPjP does not recommend collection of field blanks for the waste zone matrices to be analyzed for PCBs.

5.1.3 Equipment Rinsate Blanks

An equipment rinsate blank sample is obtained by rinsing sample collection equipment with analyte-free water, following decontamination, to evaluate field decontamination procedures. Equipment

rinsate blanks will not be collected as part of this investigation. The excavator bucket will be the field sampling equipment used to collect the NTW or WZM. It is impractical to attempt to decontaminate the excavator bucket and collect an equipment rinsate each time samples are collected.

New, single-use equipment is being used to collect underburden cores. A steel core tube used in cold operations tests of core collections will be cleaned according to GDE-162, “Decontaminating Sampling Equipment” or Section 4.2 of TPR-1641, “Collection of Vadose Zone Water Samples at the RWMC” prior to use in warm operations.

5.1.4 Trip Blanks

In accordance with the QAPjP, trip blanks are not required for the analyses and matrices in this FSP.

5.2 Collection of Nontargeted Waste Samples

The sampling process requires the collection of 68 random samples to obtain a representative average TRU activity.

The excavator will collect a scoop of NTW material (i.e., the sample) from a randomly selected location on the return angle of repose. Locations are identified by simple grid markings on the north and west end walls of the RE. The grids are labeled in 4.6-m (15-ft) increments. The depth of the retrieved sample will be measured by the judgment of the operator and the predefined random grid locations in Table 3. The excavator operator will communicate the approximate coordinates and depth of the retrieved scoop to the person responsible for data collection at the DPS. The excavator operator will place the load in a tray for transport to a DPS by the telehandler.

Visual examination for WIPP certification will be performed on retrieved NTW material and WIPP prohibited items will be removed under WIPP certified protocols. A detailed physical description and photographs of the sampled materials that would have otherwise not been retrieved will be recorded by the operator or person responsible for data collection at the DPS. The operator at the DPS or person responsible for data collection at the DPS will collect physical description information before the liner is placed into a drum, and the drum identification for the NTW sample will be recorded.

The OU 7-13/14 sample collection will take advantage of the random sampling scheme that already collects trays of NTW. Sample collection for OU 7-13/14 can occur after the visual examination for WIPP certification of the retrieved NTW material and before the liner is placed into a drum. The operator at the DPS will collect a grab sample of nondebris NTW in a 60-mL container from the cartload of NTW.

The drummed NTW samples will be weighed and assayed for compliant CERCLA storage and will undergo nondestructive assay (performed by CCP) in the same manner as the retrieved TW.

5.3 Collection of Underburden Soil Samples

The randomly selected locations for underburden sample collection are identified using the grid markings on the RE walls to identify underburden sample coordinates. The excavator operator will determine which return campaign (exposed swath of underburden) is most centered on the coordinate location.

When visual examination by the excavator operator determines the waste zone/underburden interface has been reached, the operator will use the bucket on the excavator to progressively scrape off a 7.6–10.1-cm (3–4-in.) layer to ensure exposure of underburden for core collection.

The core procedure will be detailed in a technical procedure. The procedure will include collection and handling requirements focused on minimizing cross-contamination during collection and handling in

the DPS. Subsampling of the core will take place in a clean environment to avoid cross-contamination issues.

Core integrity is important to determine attenuation of radionuclides with depth under the buried waste and the core must be handled so that partial cores do not crumble. A compressible plug (e.g., a cork or Styrofoam-based insert) will be placed in the bottom end of the core liner before the core is collected. The plug will be displaced up the core liner as the core is collected. The plug shall fit tightly enough such that it can be displaced up the liner as the core advances, but will prevent the core from crumbling into the unfilled portion of the core liner during subsequent handling and transportation activities.

Details of the laboratory core subsampling, including requirements to mitigate cross-contamination during subsampling, will be included in the laboratory task order statement of work.

A summary of relevant information, including the number of samples planned, analyses, proposed methods, and sample container (i.e., collection vessel), appears in Table 612.

Table 612. Sample target and analytical parameters summary information.

Number of Samples (including quality control)		Analytes or Analyte Groups		Recommended Container (collection vessel)	Preservative	Holding Time
Sample Target	Analytical Method(s)					
Retrieved roaster-oxide materials	11	1. SW-846 Method 8260B 2. SW-846 Method 8082 3. SW-846 Method 1311; and 6010B and 7000 series, or Method 6020 4. SW-846-Method 8270C 5. SW-846-Method 9095B 6. SW-846 Method 9014 or 9213	1. VOCs 2. PCBs 3. UTS Metals 4. Semivolatle organic compounds 5. Paint filter liquids test 6. Extractable Cyanide, Total and Amenable to Chlorination	1-5. Two 20-mL clear glass vials with Teflon lids or Teflon-lined speta <u>or</u> a 60-mL widemouth jar with Teflon lid.	Cool, 4°C	1. 14 days until analysis 2. 14 days to extraction, 40 days to analysis 3. 28 days to extraction, 28 days to analysis 4. 14 days to extraction, 40 days to analysis 5. No holding time is applicable for this test. 6. 14 days until analysis
Material that stays in the pit (sampled materials which would have otherwise not been retrieved)	68	100% drum assay will provide TRU characterization	1. Transuranic activity (i.e., Ci) 2. Pu-239 equivalent activity (i.e., PE-Ci) 3. Pu-239 FGE 4. Uranium isotopic masses (U-233, U-234, and U-238) 5. Plutonium isotopic masses (Pu-238, Pu-239, Pu-240, and	Drum	None required	Not applicable to the CCP TRU assay

Table 12. (continued).

Sample Target	Number of Samples (including quality control)	Analytical Method(s)	Analyte Groups	Recommended Container (collection vessel)	Preservative	Holding Time
			Pu-242)			
			6. Am-241 mass			
			7. Total fissile mass (U-233, U-235, and Pu-239)			
Material that stays in the pit (sampled materials which would have otherwise not been retrieved)	12	1. Low energy photon spectrometry or equivalent method. 2-4. Liquid scintillation or equivalent counting method. 5. Mass spectrometry, alpha spectrometry, or other equivalent method 6-7. Alpha spectroscopy or equivalent method.	1. Iodine-129 2. Technetium-99 3. Carbon-14 4. Chlorine-36 5. Plutonium isotopes (Pu-238 and Pu-239/240) 6. Neptunium-237 7. Uranium isotopes (U-233/234, U-235/236, U-238)	1-7. 60-mL widemouth clear glass jar with Teflon lined lid.	1-7. None.	180 days from collection until analysis for radiological COCs
WZM potentially regulated by TSCA	64	SW-846 Method 8082	PCBs	60-mL widemouth clear glass jar with Teflon-lined lid	Cool, 4°C.	14 days to extraction, 40 days to analysis for PCBs

Table 12. (continued).

Sample Target	Number of Samples (including quality control)	Analytical Method(s)	Analytes or Analyte Groups	Recommended Container (collection vessel)	Preservative	Holding Time
VOCs and radiological OU 7-13/14 COCs	Six cores with up to two subsamples from each core	1. Low-energy photon spectrometry or equivalent method. 2-4. Liquid scintillation or equivalent counting method. 5. Mass spectrometry, alpha spectrometry, or other equivalent method 6-7. Alpha spectroscopy or equivalent method. 8. SW-846 Method 8260B	1. Iodine-129 2. Technetium-99 3. Carbon-14 4. Chlorine-36 5. Plutonium isotopes (Pu-238 and Pu-239/240) 6. Neptunium-237 7. Uranium isotopes (U-233/234, U-235/236, U-238) 8. VOCs	Capped core sleeve—subsampled at the laboratory	The core material is stored at 4°C. Subsamples collected for analyses 1–7 do not require cooling to 4°C.	14 days until analysis for VOCs; 180 days from collection until analysis for radiological COCs
COC = contaminant of concern FGE = fissile gram equivalent		OU = operable unit PCB = polychlorinated biphenyl	TCLP = toxicity characteristic leaching procedure TSCA = Toxic Substances Control Act VOC = volatile organic compound		UTS = Universal Treatment Standard WZM = waste zone material	

5.4 Collection of Waste Zone Material Samples

5.4.1 Excavation of Cubical Volume

The Plan of the Week (or Day) will identify when a sampling location (identified in Tables 5–10) is being approached. Operations will evaluate the waste zone to determine the material type (e.g., homogeneous solids [inorganic or organic waste forms], soil and gravel, or debris [such as combustibles, metals, and glass]). If there is interstitial soil and sludge with the debris, the waste will be excavated. With the exception of a primarily (greater than 50%) debris area, the waste will be excavated for sampling. If a primarily debris (greater than 50%) area (e.g., a waste box with metals or PPE) is located at the sampling coordinates, an alternate sampling location will be identified using the approach outlined in Section 3.2.3. The excavator shovel will be used to collect material with the x, y, z coordinates given in Tables 5–10. Tolerances on those coordinates are plus or minus 1 m (3 ft) in the horizontal direction and plus or minus 0.6 m (2 ft) in the vertical direction. The material will be placed in a tray and tracked from the excavation site to the repackaging station where sample collection activities will be performed.

A bucket-position monitor will be used in conjunction with suspended markers to document the x, y, z location. The bucket-position monitor provides the horizontal (reach) and vertical (depth, z) displacement of the center of the bucket, while suspended markers provide the location and depth of each sample. Samples are retrieved by touching a suspended marker with the side of the excavator bucket and documenting the horizontal distance from the excavator cab (displayed within the excavator cab on a depth monitor) and the vertical distance from the bottom of the excavator tracks (also displayed within the excavator cab on a depth monitor). The sample volume will be excavated from the appropriate depth, indicated on the marker, while maintaining the same horizontal distance from the excavator cab. Using the bucket position monitor in concert with the suspended markers, the project's sampling data will be correlated with the location of waste in the pit. Operators will keep track of each scoop of waste identified for sampling by recording the scoop location, which will be correlated to the drum number in which the waste will be packaged.

An alternate sample location will be identified with respect to the original coordinates. If the dig is progressing in the east-west direction, the new horizontal distance from the excavator cab to the sample location will be used to determine the sample coordinates. If the dig is progressing in the north-south direction, the alternate sample location will be identified using bucket widths from the original coordinates. Identifying the sample or alternate sample locations will be documented in detail in EDF-4991, "Installation and Use of X-Y-Z Markers for the Accelerated Retrieval Project for a Described Area within Pit 4."

5.4.2 Tray Tracking

The excavated material identified for sampling will be loaded onto a tray for transport to the DPS. A specially colored sampling tray liner will be used to indicate that the material is designated for sampling. Personnel responsible for data collection at the DPS will record the collection location and the date.

5.4.3 Sample Collection from Tray

The sampling approach within the tray will be to obtain samples representative of the tray contents. The tray will be divided into quadrants: 1 is top left; 2 is top right; 3 is bottom left; and 4 is bottom right. The sample will be collected from the center of a randomly selected quadrant. Table 13 identifies the quadrant for each sample given in Tables 5–10.

Table 13. Random quadrant identification for each sample.

Random Sample	Quadrant	Random Sample	Quadrant
1	4	31	1
2	2	32	4
3	3	33	4
4	1	34	3
5	1	35	3
6	4	36	3
7	1	37	3
8	2	38	2
9	3	39	1
10	3	40	1
11	3	41	4
12	3	42	1
13	3	43	3
14	3	44	4
15	4	45	4
16	3	46	1
17	2	47	2
18	3	48	1
19	4	49	3
20	3	50	3
21	4	51	1
22	1	52	2
23	3	53	4
24	3	54	4
25	3	55	2
26	2	56	3
27	3	57	3
28	4	58	3
29	2	59	1
30	3	60	1

The sampling process could include sludge, cemented sludge, or soil. If a solid mass of material (e.g., solidified waste) is encountered, a hammer and chisel may be used for material-size reduction to collect the needed quantity of sample.

5.5 Collection of Roaster-Oxide Waste Samples

The drums randomly selected for sample collection in the 30-drum population are identified using a random number generator.

After receiving the waste tray in the DPS or exposing the waste in the drum, the sampler will collect a grab sample of the waste from the middle of the exposed material. If large chunks of uranium are encountered, they will not be sized for sampling. If eligible material for sampling is not encountered in the middle of the exposed material, the sampler should move from the middle to the first area of eligible material for sampling. New, single-use equipment will be used for grab sample collection.

6. SAMPLE HANDLING AND ANALYSIS

6.1 Documentation

The sampling coordinator will be responsible for controlling and maintaining all field documents and records and for ensuring that all required documents are submitted to the Idaho Cleanup Project Administrative Records and Document Control. All entries will be made in permanent ink. All errors will be corrected by drawing a single line through the error and entering the correct information. All corrections will be initialed and dated.

6.1.1 Drum Information for Nontargeted Waste Drums

The number assigned to the NTW drum and the detailed description of the nontargeted material will be recorded at the DPS on a sample data collection form. When an OU 7-13/14 sample is collected from the NTW tray, the sample identification and the drum number into which the sampled tray will be placed will be recorded on the sample data collection form.

6.1.2 Sample Container Labels for Waste Zone Material, Roaster-Oxide Waste, Nontargeted Waste for Operable Unit 7-13/14, and Underburden Soil Samples

Waterproof, gummed labels will display information such as the sample ID number, the name of the project, sample location, and analysis type. In the field, labels will be completed and placed on the containers before sample collection. Information concerning the sample collection date, time, preservative used, field measurements of hazards, and the sampler's initials will be filled out during field sampling activities. MCP-1192, "Chain of Custody and Sample Labeling for ER and D&D&D Projects," establishes the container labeling procedure for this project. The exception to this procedure is that certain information (e.g., collection date and time) may be left off the labels as long as the information is recorded on the chain-of-custody record.

6.1.3 Logbooks

MCP-1194, "Logbook Practices for ER and D&D&D Projects," establishes logbook use and administration procedures for this project. The logbook requirement may be fulfilled by the use of project-specific sample forms. Information pertaining to sampling activities will be entered on the forms. Entries will be dated and signed by the individual making the entry. All forms will have a quality control check for accuracy and completeness.

6.1.4 Data Management

Sample data will be managed in hardcopy format and analytical data will be managed in electronic image format (Portable Document Format). The project may integrate, as practical, currently existing data management systems (e.g., Integrated Environmental Data Management System) for the control of analytical sample information collected to support the project. The NTW drum information will be tracked in the Integrated Waste Tracking System.

6.2 Sample Handling

6.2.1 Sample Preservation

Preservation is not required for the drummed NTW or NTW samples collected for OU 7-13/14 radiological COC analysis collected for radionuclide analyses. Roaster-oxide samples, samples collected for PCB analysis, and underburden cores will be preserved by chilling them once they leave the DPS. During some operations (e.g., fissile material monitor assay), maintaining temperature at 4°C may be difficult. Efforts will be made to maintain sample temperature requirements as close as practicable.

6.2.2 Sample Custody

The chain-of-custody record is a form that serves as a written record of sample handling. When a sample changes custody, the person(s) relinquishing and receiving the sample will sign a chain-of-custody form. Each change of possession will be documented; therefore, a written record that tracks sample handling will be established. The custody procedure for sample collection is established in MCP-1192.

Chain of custody requirements will apply to the OU 7-1/314 NTW samples, WZM samples, roaster-oxide samples, and underburden cores and subsamples. The drums of NTW will be identified and segregated from the retrieved TW drums.

6.2.3 Sample Transportation

Project personnel will transport samples in accordance with direction from the packaging and transportation organization.

7. WASTE MANAGEMENT

The waste management approach and practices, waste minimization, waste segregation are described in the *Removal Action Plan for the Accelerated Retrieval Project for a Described Area within Pit 4* (DOE-ID 2005).

Waste generated from sampling activities is a small subset of the waste being generated and managed by ARP I. Waste management activities will be performed in a manner that protects human health and the environment and achieves waste minimization to the extent possible.

7.1 Waste Types and Disposition Logic

Various types of waste will be generated from both sampling and analytical activities. These include:

- Drums of NTW collected for TRU assay
- Sample-collection waste generated within the confines of the DPS
- Unaltered, unused underburden sample
- Unaltered, unused WZM sample
- Unaltered, unused roaster-oxide sample
- Analysis residues and miscellaneous laboratory waste.

7.1.1 Waste Types Associated with Nontargeted Waste Drum Samples

Drums of NTW that are collected for TRU assay will be managed as described in the Container Management section in the *Removal Action Plan* (DOE-ID 2005). The drums will be stored in the ARP I CERCLA storage areas. The drummed material may be shipped to WIPP as TRU waste or disposed of with other non-TRU (i.e., alpha low-level waste). The DOE will give preference to disposal options that do not involve return to pit (e.g., off-Site treatment and disposal) and will only consider returning waste to the pit that do not present unacceptable risk to the aquifer, subject to agreement with the Idaho Department of Environmental Quality and EPA.

Sample collection waste for the NTW drums includes waste associated with decontamination activities and PPE. These items will be dispositioned as part of the secondary waste related to the retrieving, processing, and packaging of Pit 4 retrieved waste.

7.1.2 Waste Types Associated with Operable Unit 7-13/14 Nontargeted Waste Samples, Roaster-Oxide Samples, Waste Zone Material Samples, and Underburden Samples

Waste zone material, OU 7-13/14 NTW, roaster-oxide waste, and underburden sample collection waste includes used disposable sampling tools (e.g., scoops and spatulas), wipes, plastic bags, and gloves that were used in the collection of samples within the DPS. Waste Generator Services (WGS) will manage all waste and will complete a hazardous waste determination in accordance with applicable MCPs.

Analysis residues are expected to contain laboratory reagents in addition to what was in the original sample. Miscellaneous laboratory waste includes glassware, filters, and stirring devices that were potentially contaminated by the sample and laboratory reagents. Altered sample and miscellaneous laboratory waste from this project may be combined. The laboratory reagents may add additional waste codes (i.e., hazardous waste numbers) to the original sample material.

If the OU 7-13/14 NTW, WZM, roaster-oxide waste, or underburden samples are sent for analysis to an on-Site facility, processing of analysis residues (including absorption of free liquids and proper packaging to support compliant storage) will be supported by the WGS organization at the Test Reactor Area and Central Facilities Area. The laboratory, as the waste generator, will work with the WGS organization to ensure proper identification, coding, and reporting of hazardous constituents in the altered waste. The processed waste will be stored in a satellite accumulation area. WGS will ensure proper disposition or disposal of the material. Unaltered unused sample materials will be stored by the project until disposition under the OU 7-13/14 ROD.

If the OU 7-13/14 NTW, WZM, roaster-oxide waste, or underburden samples are sent for analysis to an off-Site facility, the laboratory will dispose of the derived sample waste in accordance with ER-SOW-394, “Sample and Analysis Management Statement of Work for Analytical Services.” Unused sample volume will be returned to the project for storage until disposition under the OU 7-13/14 ROD.

Table 7 summarizes the types of waste anticipated to be generated during the sampling effort, the projected waste classification, the estimated waste quantity, and the expected disposition paths.

Table 714. Sampling waste stream disposition path summary.

Expected Waste Stream	Potential Waste Classification	Estimated Volume	Potential Disposition Path
NTW, roaster-oxide waste, and underburden sample collection waste, including wipes, plastic bags, and PPE, which were used in the collection and processing of samples within the confines of the project (i.e., DPSs and others areas).	Mixed TRU waste, low-level mixed waste, low-level radioactive waste and industrial waste	<1 m ³ (processed with other ARP I project waste and not tracked individually)	ARP I will disposition these items.
Unaltered unused underburden sample volume and core material	Low-level mixed waste	<1 m ³	The unaltered unused sample volume will be stored until dispositioned under the OU 7-13/14 record of decision.
Unaltered unused NTW and WZM sample volume	Mixed TRU waste (potentially TSCA), low-level mixed waste, and low-level radioactive waste	<1 m ³	Same as above.

Table 7. (continued).

Expected Waste Stream	Potential Waste Classification	Estimated Volume	Potential Disposition Path
Analysis residues (i.e., altered roaster-oxide materials, NTW, WZM, and underburden material containing residues of laboratory analytical reagents) and contaminated laboratory equipment (e.g., glassware and filters).	Mixed TRU waste, low-level mixed waste (potentially TSCA) These sample residues and other materials may contain chemicals added as part of laboratory analyses.	<1 m ³	Initial processing and packaging is expected to be done at the analytical laboratory and may include absorption of any free liquids. The processed waste is expected to be stored in a satellite accumulation area. WGS will ensure proper disposition or disposal of the material.
ARP I = Accelerated Retrieval Project DPS = drum packaging station NTW = nontargeted waste	PPE = personal protective equipment TSCA = Toxic Substances Control Act WGS = Waste Generator Services		WZM = waste zone material

7.2 Waste Determinations

All waste streams resulting from sampling efforts will be identified, characterized, and managed in accordance with the requirements and processes defined in federal and state regulations; DOE Order 435.1, “Radioactive Waste Management”; DOE Order 5400.5, “Radiation Protection of the Public and the Environment”; the approved waste acceptance criteria for ARP I stored waste; and the following company management procedures, as appropriate:

- MCP-62, “Waste Generator Services—Low-Level Waste Management”
- MCP-63, “Waste Generator Services—Industrial Waste Management”
- MCP-69, “Waste Generator Services—Hazardous Waste Management”
- MCP-70, “Mixed Low-Level Waste Management”
- MCP-3472, “Identification and Characterization of Environmentally Regulated Waste”
- ICP-MCP-3475, “Temporary Storage of CERCLA-Generated Waste at the INEEL Site”
- MCP-3480, “Environmental Instructions for Facilities, Materials, and Equipment.”

A hazardous waste determination will be conducted for each waste stream in accordance with the requirements in 40 CFR 262.11, “Hazardous Waste Determination,” to guide proper management of the waste. The determination will also include a TSCA evaluation in accordance with 40 CFR 761, “Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions.” These determinations may be documented on Form 435.39, “Waste Determination and Disposition Form.”

7.3 Pollution Prevention and Waste Minimization

Pollution prevention and waste minimization techniques have been and will continue to be incorporated into planning and daily work practices to improve work safety and efficiency and to reduce environmental and financial liability.

Examples of practices instituted to support pollution prevention and waste minimization include:

- Implementing a statistical sampling approach that, by minimizing the numbers of samples taken, minimizes the generation of sample-collection waste and reduces the number of NTW drums to be stored and dispositioned.
- Conducting retrieval and sampling activities using remote operations including the use of cameras and windows not only protects the workers, but also reduces personnel entry. This results in a significant reduction in generation of PPE waste.
- Controlling transfer of samples between contaminated zones and clean areas, which minimizes the spread of contamination and generation of new waste.

8. REFERENCES

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Appendix A

Sampling and Analysis Plan Tables

Appendix A

Sampling and Analysis Plan Tables

These tables contain the following information and is discussed in Section 4.2 of this field sampling plan:

- Sample description fields
- Sample location fields
- Analysis types
- Specific analysis code designations.

Sampling and Analysis Plan Table for Chemical and Radiological Analysis

Plan Table Number: ARP_UNDERBURDEN

SAP Number: ICP/EXT-04-00516

Date: 05/19/2006

Plan Table Revision: 9

Project: ACCELERATED RETRIEVAL PROJ FOR DESC AREA WITHIN PIT 4

Project Manager: SALOMON, H.

SMD Contact: MOLWAIN, B. A.

Sample Description					Sample Location		Enter Analysis Types (AT) and Quantity Requested																						
Sampling Activity	Sample Type	Sample Matrix	Coil Type	Sampling Method	Planned Date	Area	Type of Location	Location	Depth (ft)	AT1	AT2	AT3	AT4	AT5	AT6	AT7	AT8	AT9	AT10	AT11	AT12	AT13	AT14	AT15	AT16	AT17	AT18	AT19	AT20
ARPM00	REG	WASTE	GRAB	RANDOM	06/01/2005	RWMC-PIT4	ROASTER OXIDE	DRUM	NA		1																		
ARPM01	REG	WASTE	GRAB	RANDOM	06/01/2005	RWMC-PIT4	ROASTER OXIDE	DRUM	NA		1																		
ARPM02	REG	WASTE	GRAB	RANDOM	06/01/2005	RWMC-PIT4	ROASTER OXIDE	DRUM	NA		1																		
ARPM03	REG	WASTE	GRAB	RANDOM	06/01/2005	RWMC-PIT4	ROASTER OXIDE	DRUM	NA		1																		
ARPM04	REG	WASTE	GRAB	RANDOM	06/01/2005	RWMC-PIT4	ROASTER OXIDE	DRUM	NA		1																		
ARPM05	REG	WASTE	GRAB	RANDOM	06/01/2005	RWMC-PIT4	ROASTER OXIDE	DRUM	NA		1																		
ARPM06	REG	WASTE	GRAB	RANDOM	06/01/2005	RWMC-PIT4	ROASTER OXIDE	DRUM	NA		1																		
ARPM07	REG	WASTE	GRAB	RANDOM	06/01/2005	RWMC-PIT4	ROASTER OXIDE	DRUM	NA		1																		
ARPM08	REG	WASTE	GRAB	RANDOM	06/01/2005	RWMC-PIT4	ROASTER OXIDE	DRUM	NA		1																		
ARPM09	REG	WASTE	GRAB	RANDOM	06/01/2005	RWMC-PIT4	ROASTER OXIDE	DRUM	NA		1																		
ARPM10	REG	WASTE	GRAB	RANDOM	06/01/2005	RWMC-PIT4	ROASTER OXIDE	DRUM	NA		1																		
ARPU01	REG	SOIL	CORE	CORE	06/01/2005	RWMC-PIT4	UNDERBURDEN	CORE 1	TBD			1																	
ARPU02	REG	SOIL	CORE	CORE	06/01/2005	RWMC-PIT4	UNDERBURDEN	CORE 1 SUB1	TBD		1					1													
ARPU03	REG	SOIL	CORE	CORE	06/01/2005	RWMC-PIT4	UNDERBURDEN	CORE 1 SUB2	TBD		1					1													
ARPU04	REG	SOIL	CORE	CORE	06/01/2005	RWMC-PIT4	UNDERBURDEN	CORE 2	TBD												1								
The sampling activity displayed on this table represents the first 610 characters of the sample identification number.					The complete sample identification number will appear on the sample label.					D - Double QC Volume										T - Triple QC Volume									
AT1: Analysis Suite #1					AT11:					Comments:										Nontargeted waste samples are drums and will be tracked by drum number by the project.									
AT2: Analysis Suite #2					AT12:																								
AT3: Analysis Suite #3					AT13:															For 12 nontargeted waste sample trays that will be loaded into drums, a sample of non-shores nontargeted waste will be collected for OUT-15714 analysis.									
AT4: Gamma Spec/Gross Alpha-Beta					AT14:																								
AT5: PCBs					AT15:																								
AT6: Total Metals (CLP TAL)					AT16:																								
AT7: VOCs (TAL)					AT17:																								
AT8:					AT18:																								
AT9:					AT19:																								
AT10:					AT20:																								
Analysis Suites:					Contingencies:																								
Analysis Suite #1: Cl-36, C-14, I-130, Np-237, Pu-238, U-235, U-238																													
Analysis Suite #2: Cyanide (Total & Ammoniacal), PCBs, Paint Filter Liquids, Test SVOCs by GC/MS, TCLP UTS Metals, VOCs by GC/MS																													
Analysis Suite #3: Cl-36, C-14, I-130, Np-237, Pu-238, U-235, U-238, U-235, U-238																													

Sampling and Analysis Plan Table for Chemical and Radiological Analysis

Plan Table Number: ARP_UNDERBURDEN

SAP Number: ICP/EXT-04-00516

Date: 05/19/2006

Plan Table Revision: 9

Project: ACCELERATED RETRIEVAL PROJ FOR DESC AREA WITHIN PIT 4

Project Manager: SALOMON, H.

SMD Contact: MOLWAIN, B. A.

Sample Description					Sample Location					Enter Analysis Types (AT) and Quantity Requested																			
Sampling Activity	Sample Type	Sample Matrix	Soil Type	Sampling Method	Planned Date	Area	Type of Location	Location	Depth (ft)	AT1	AT2	AT3	AT4	AT5	AT6	AT7	AT8	AT9	AT10	AT11	AT12	AT13	AT14	AT15	AT16	AT17	AT18	AT19	AT20
ARPU05	REG	SOIL	CORE	CORE	08/01/0005	RWMC-PIT4	UNDERBURDEN	CORE 2 SUB1	TBD	1						1													
ARPU06	REG	SOIL	CORE	CORE	08/01/0005	RWMC-PIT4	UNDERBURDEN	CORE 2 SUB2	TBD	1						1													
ARPU07	REG	SOIL	CORE	CORE	08/01/0005	RWMC-PIT4	UNDERBURDEN	CORE 3	TBD			1																	
ARPU08	REG	SOIL	CORE	CORE	08/01/0005	RWMC-PIT4	UNDERBURDEN	CORE 3 SUB1	TBD	1						1													
ARPU09	REG	SOIL	CORE	CORE	08/01/0005	RWMC-PIT4	UNDERBURDEN	CORE 3 SUB2	TBD	1						1													
ARPU10	REG	SOIL	CORE	CORE	08/01/0005	RWMC-PIT4	UNDERBURDEN	CORE 4	TBD				1																
ARPU11	REG	SOIL	CORE	CORE	08/01/0005	RWMC-PIT4	UNDERBURDEN	CORE 4 SUB1	TBD	1						1													
ARPU12	REG	SOIL	CORE	CORE	08/01/0005	RWMC-PIT4	UNDERBURDEN	CORE 4 SUB2	TBD	1						1													
ARPU13	REG	SOIL	CORE	CORE	08/01/0005	RWMC-PIT4	UNDERBURDEN	CORE 5	TBD				1																
ARPU14	REG	SOIL	CORE	CORE	08/01/0005	RWMC-PIT4	UNDERBURDEN	CORE 5 SUB1	TBD	1						1													
ARPU15	REG	SOIL	CORE	CORE	08/01/0005	RWMC-PIT4	UNDERBURDEN	CORE 5 SUB2	TBD	1						1													
ARPU16	REG	SOIL	CORE	CORE	08/01/0005	RWMC-PIT4	UNDERBURDEN	CORE 6	TBD				1																
ARPU17	REG	SOIL	CORE	CORE	08/01/0005	RWMC-PIT4	UNDERBURDEN	CORE 6 SUB1	TBD	1						1													
ARPU18	REG	SOIL	CORE	CORE	08/01/0005	RWMC-PIT4	UNDERBURDEN	CORE 6 SUB2	TBD	1						1													
ARPU01	REG/OC	WASTE	GRAB	RANDOM	12/01/0004	RWMC - PIT 4	WASTE ZONE	GRID 1ST QTR AC	TBD																2				

The sampling activity displayed on the table represents the first 610 characters of the sample identification number.

AT1: Analysis Suite #1

AT2: Analysis Suite #2

AT3: Analysis Suite #3

AT4: Gamma Spec/Gross Alpha-Beta

AT5: PCBs

AT6: Total Metals (CLP TAL)

AT7: VOCs (TAL)

AT8:

AT9:

AT10:

AT11:

AT12:

AT13:

AT14:

AT15:

AT16:

AT17:

AT18:

AT19:

AT20:

The complete sample identification number will appear on the sample label.

Comments:

Nonregulated waste samples are drums and will be tracked by drum number by the project.

For 12 nonregulated waste sample types that will be loaded into drums, a sample of non-shores

nonregulated waste will be collected for OUI7-13/14 analyses.

D - Double QC Volume

T - Triple QC Volume

Analysis Suites:

Analysis Suite #1: Cl-36, C-14, I-130, Np-237, Pu-238, U-235, U-238

Analysis Suite #2: Cyanide (Total & Amenable), PCBs, Paint Filter Liquids, Test SVOCs by GC/MS, TCLP UTS Metals, VOCs by GC/MS

Analysis Suite #3: Cl-36, C-14, I-130, Np-237, Pu-238, U-235, U-238, U-238, U-238

Contingencies:

Sample Description					Sample Location				Enter Analysis Types (AT) and Quantity Requested																				
Sampling	Sample Type	Sample Matrix	Coil Type	Sampling Method	Planned Date	Area	Type of Location	Location	Depth (ft)	AT1	AT2	AT3	AT4	AT5	AT6	AT7	AT8	AT9	AT10	AT11	AT12	AT13	AT14	AT15	AT16	AT17	AT18	AT19	AT20
APPW02	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 1ST QTR AC	TBD						1	1													
APPW03	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 1ST QTR AC	TBD																				
APPW04	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 1ST QTR AC	TBD						1														
APPW05	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 1ST QTR AC	TBD						1														
APPW06	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 1ST QTR AC	TBD						1														
APPW07	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 1ST QTR AC	TBD						1														
APPW08	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 1ST QTR AC	TBD						1														
APPW09	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 1ST QTR AC	TBD						1														
APPW10	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 1ST QTR AC	TBD						1														
APPW11	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 1ST QTR AC	TBD						1														
APPW12	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 1ST QTR AC	TBD						1														
APPW13	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 1ST QTR AC	TBD						1														
APPW14	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 1ST QTR AC	TBD						1														
APPW15	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 1ST QTR AC	TBD						1														
APPW16	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 1ST QTR AC	TBD						1														
															1														
The complete sample identification number will appear on the sample labels.										D - Double QC Volume T - Triple QC Volume										Comments:									
																				Nontargeted waste samples are drums and will be tracked by drum number by the project.									
																				For 12 nontargeted waste sample trays that will be loaded into drums, a sample of non-obscure nontargeted waste will be collected for OU7-13/14 analyses.									

Sampling and Analysis Plan Table for Chemical and Radiological Analysis

Plan Table Number: ARP_UNDERBURDEN

SAP Number: ICP/EXT-04-00516

Date: 05/19/2006

Plan Table Revision: 9

Project: ACCELERATED RETRIEVAL PROJ FOR DESC AREA WITHIN PIT 4

Project Manager: SALOMON, H.

SMD Contact: MOLWAIN, B.A.

Sample Description					Sample Location				Enter Analysis Types (AT) and Quantity Requested																				
Sampling Activity	Sample Type	Sample Matrix	Coll. Type	Sampling Method	Planned Date	Area	Type of Location	Location	Depth (ft)	AT1	AT2	AT3	AT4	AT5	AT6	AT7	AT8	AT9	AT10	AT11	AT12	AT13	AT14	AT15	AT16	AT17	AT18	AT19	AT20
APRW47	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 2ND QTR AC	TBD					1															
APRW48	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 2ND QTR AC	TBD					1															
APRW49	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 2ND QTR AC	TBD					1															
APRW50	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 2ND QTR AC	TBD					1															
APRW51	REG/QC	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 2ND QTR AC	TBD					2															
APRW52	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 2ND QTR AC	TBD					1															
APRW53	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 2ND QTR AC	TBD					1															
APRW54	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 2ND QTR AC	TBD					1															
APRW55	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 2ND QTR AC	TBD					1															
APRW56	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 2ND QTR AC	TBD					1															
APRW57	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 2ND QTR AC	TBD					1															
APRW58	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 2ND QTR AC	TBD					1															
APRW59	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 2ND QTR AC	TBD					1															
APRW60	REG	WASTE	GRAB	RANDOM	12/01/2004	RWMC - PIT 4	WASTE ZONE	GRID 2ND QTR AC	TBD					1															
APRW01	REG	WASTE	GRAB	RANDOM	03/01/2005	RWMC - PIT 4	WASTE ZONE	1ST QTR AGRE	TBD	1																			

The sampling activity displayed on this table represents the first 610 characters of the sample identification number.

AT1: Analysis Suite #1

AT2: Analysis Suite #2

AT3: Analysis Suite #3

AT4: Analysis Suite #4

AT5: Analysis Suite #5

AT6: Analysis Suite #6

AT7: Analysis Suite #7

AT8: Analysis Suite #8

AT9: Analysis Suite #9

AT10: Analysis Suite #10

AT11: Analysis Suite #11

AT12: Analysis Suite #12

AT13: Analysis Suite #13

AT14: Analysis Suite #14

AT15: Analysis Suite #15

AT16: Analysis Suite #16

AT17: Analysis Suite #17

AT18: Analysis Suite #18

AT19: Analysis Suite #19

AT20: Analysis Suite #20

AT21: Analysis Suite #21

AT22: Analysis Suite #22

AT23: Analysis Suite #23

AT24: Analysis Suite #24

AT25: Analysis Suite #25

AT26: Analysis Suite #26

AT27: Analysis Suite #27

AT28: Analysis Suite #28

AT29: Analysis Suite #29

AT30: Analysis Suite #30

AT31: Analysis Suite #31

AT32: Analysis Suite #32

AT33: Analysis Suite #33

AT34: Analysis Suite #34

AT35: Analysis Suite #35

D - Double QC Volume

T - Triple QC Volume

Comments:

Nonregulated waste samples are drums and will be tracked by drum number by the project.

For 12 nonregulated waste sample trays that will be loaded into drums, a sample of non-shores

nonregulated waste will be collected for OUI-13/14 analysis.

Analysis Suites:

Analysis Suite #1: Cl-36, C-14, I-131, Np-237, Pu-238, U-235, U-238

Analysis Suite #2: Cyanide (Total & Ammoniacal), PCBs, Paint Filter Liquids, Test SVOCs by GC/MS, TCLP UTS Metals, VOCs by GC/MS

Analysis Suite #3: Cl-36, C-14, I-131, Np-237, Pu-238, U-235, U-238

Analysis Suite #4: Cl-36, C-14, I-131, Np-237, Pu-238, U-235, U-238

Analysis Suite #5: Cl-36, C-14, I-131, Np-237, Pu-238, U-235, U-238

Analysis Suite #6: Cl-36, C-14, I-131, Np-237, Pu-238, U-235, U-238

Analysis Suite #7: Cl-36, C-14, I-131, Np-237, Pu-238, U-235, U-238

Analysis Suite #8: Cl-36, C-14, I-131, Np-237, Pu-238, U-235, U-238

Analysis Suite #9: Cl-36, C-14, I-131, Np-237, Pu-238, U-235, U-238

Analysis Suite #10: Cl-36, C-14, I-131, Np-237, Pu-238, U-235, U-238

Analysis Suite #11: Cl-36, C-14, I-131, Np-237, Pu-238, U-235, U-238

Analysis Suite #12: Cl-36, C-14, I-131, Np-237, Pu-238, U-235, U-238

Analysis Suite #13: Cl-36, C-14, I-131, Np-237, Pu-238, U-235, U-238

Analysis Suite #14: Cl-36, C-14, I-131, Np-237, Pu-238, U-235, U-238

Analysis Suite #15: Cl-36, C-14, I-131, Np-237, Pu-238, U-235, U-238

Analysis Suite #16: Cl-36, C-14, I-131, Np-237, Pu-238, U-235, U-238

Analysis Suite #17: Cl-36, C-14, I-131, Np-237, Pu-238, U-235, U-238

Analysis Suite #18: Cl-36, C-14, I-131, Np-237, Pu-238, U-235, U-238

Analysis Suite #19: Cl-36, C-14, I-131, Np-237, Pu-238, U-235, U-238

Analysis Suite #20: Cl-36, C-14, I-131, Np-237, Pu-238, U-235, U-238

Sampling and Analysis Plan Table for Chemical and Radiological Analysis

Plan Table Number: ARP-UNDERBUDEN

SAP Number: ICP/EXT-04-00516

Date: 05/19/2006

Plan Table Revision: 9

Project: ACCELERATED RETRIEVAL PROJ FOR DESC AREA WITHIN PIT 4

Project Manager: SALOMON, H.

SMD Contact: MOLWAIN, B. A.

Sample Description					Sample Location				Enter Analysis Types (AT) and Quantity Requested																					
Sampling Activity	Sample Type	Sample Matrix	Coil Type	Sampling Method	Planned Date	Area	Type of Location	Location	Depth (ft)	AT1	AT2	AT3	AT4	AT5	AT6	AT7	AT8	AT9	AT10	AT11	AT12	AT13	AT14	AT15	AT16	AT17	AT18	AT19	AT20	
ARPX02	REG	WASTE	GRAB	RANDOM	03/01/0005	RWMC - PIT 4	WASTE ZONE	1ST QTR ACRE	TBD	1																				
ARPX03	REG	WASTE	GRAB	RANDOM	03/01/0005	RWMC - PIT 4	WASTE ZONE	1ST QTR ACRE	TBD	1																				
ARPX04	REG	WASTE	GRAB	RANDOM	03/01/0005	RWMC - PIT 4	WASTE ZONE	1ST QTR ACRE	TBD	1																				
ARPX05	REG	WASTE	GRAB	RANDOM	03/01/0005	RWMC - PIT 4	WASTE ZONE	1ST QTR ACRE	TBD	1																				
ARPX06	REG	WASTE	GRAB	RANDOM	03/01/0005	RWMC - PIT 4	WASTE ZONE	1ST QTR ACRE	TBD	1																				
ARPX07	REG	WASTE	GRAB	RANDOM	03/01/0005	RWMC - PIT 4	WASTE ZONE	2ND QTR ACRE	TBD	1																				
ARPX08	REG	WASTE	GRAB	RANDOM	03/01/0005	RWMC - PIT 4	WASTE ZONE	2ND QTR ACRE	TBD	1																				
ARPX09	REG	WASTE	GRAB	RANDOM	03/01/0005	RWMC - PIT 4	WASTE ZONE	2ND QTR ACRE	TBD	1																				
ARPX10	REG	WASTE	GRAB	RANDOM	03/01/0005	RWMC - PIT 4	WASTE ZONE	2ND QTR ACRE	TBD	1																				
ARPX11	REG	WASTE	GRAB	RANDOM	03/01/0005	RWMC - PIT 4	WASTE ZONE	2ND QTR ACRE	TBD	1																				
ARPX12	REG	WASTE	GRAB	RANDOM	03/01/0005	RWMC - PIT 4	WASTE ZONE	2ND QTR ACRE	TBD	1																				
ARPY00	REG	OIL	GRAB	N/A	07/01/0005	RWMC APP RE	EXCAVATOR	ENGINE	NA				1																	
ARPY01	REG	OIL	GRAB	N/A	07/01/0005	RWMC APP RE	EXCAVATOR	ENGINE	NA							1														

The sampling activity displayed on the table represents the first 6 to 9 characters of the sample identification number.

The complete sample identification number will appear on the sample label.

AT1: Analysis Site #1	AT11	Comments:
AT2: Analysis Site #2	AT12	Nonregulated waste samples are drums and will be tracked by drum number by the project.
AT3: Analysis Site #3	AT13	
AT4: Analysis Site #4	AT14	For 12 nonregulated waste sample trays that will be loaded into drums, a sample of non-shores nonregulated waste will be collected for OU7-13/14 analyses.
AT5: Analysis Site #5	AT15	
AT6: Analysis Site #6	AT16	
AT7: Analysis Site #7	AT17	
AT8: Analysis Site #8	AT18	
AT9: Analysis Site #9	AT19	
AT10: Analysis Site #10	AT20	

Analysis Sites:

Analysis Site #1: C-36, C-14, T-58, Np-237, Pu-238, U-235, U-238

Analysis Site #2: Cyanide (Total & Amenable), PCBs, Paint Filter Liquids, Test SVOCs by GC/MS, TCLP UTS Metals, VOCs by GC/MS

Analysis Site #3: C-36, C-14, T-58, Np-237, Pu-238, U-235, U-238, VOCs (TAL)

Contingencies: